

Arizona Commission on Judicial Conduct

1501 W. Washington Street, Suite 229

Phoenix, Arizona 85007

Formal Complaint Against Judge Charlene D. Jackson

Maricopa County Superior Court

Submitted on behalf of Erin Gerlach

Date: September 30, 2025

Dear Commissioners,

I respectfully submit this complaint against Judge Charlene Jackson regarding sustained and egregious misconduct in office. Over the past two and a half years, Judge Jackson has engaged in a documented pattern of ethical violations, retaliatory conduct, procedural manipulation, and constitutional infringements that have eroded public confidence in the judiciary and violated multiple provisions of the Arizona Code of Judicial Conduct.

These allegations are substantiated by sworn affidavits, court filings, public records, and Judge Jackson's own statements made under penalty of perjury. A detailed summary of these violations is publicly available at **this report**, which outlines some of Jackson's abuse of authority and repeated disregard for constitutional protections. While the Commission has previously dismissed complaints related to Judge Jackson's conduct in the Gerlach matter, this submission includes **new and uninvestigated evidence** of misconduct that warrants immediate and independent review.

At some point, the cumulative weight of Judge Charlene Jackson's misconduct—ranging from ethical violations to potential criminal offenses under Arizona and federal law—can no longer be rationalized or dismissed. Her repeated failure to take accountability reflects a profound disregard for judicial integrity and the rule of law. Jackson's conduct is not only eroding public trust in the judiciary; it is actively embarrassing the institution she serves and mocking the authority of the State of Arizona. Her continued evasion of responsibility demands urgent intervention and disciplinary review.

Factual Background and Narrative Summary

This complaint arises from a sustained and escalating pattern of judicial misconduct by Judge Charlene D. Jackson, whose actions reflect a deliberate abuse of judicial authority, retaliatory targeting of a litigant, and systemic violations of ethical, statutory, and constitutional standards. This complaint is filed on behalf of Erin Gerlach, who became the target of judicial retaliation after filing complaints with oversight bodies and publicly exposing misconduct within the Maricopa County Family Court system.

In 2023, Gerlach began publicly documenting egregious acts of judicial misconduct in her own case and other cases of litigants who were victimized by Judge Jackson. Rather than respond through appropriate judicial channels, Jackson weaponized her position to silence Gerlach. In March 2025, Jackson filed a personal restraining order against Gerlach—4 months after recusing herself from Gerlach’s case. In a **gross abuse of public trust**, Jackson identified herself as a “**Superior Court Judge**” in the filing to legitimize her improper filing and lend **undue credibility to a personal grievance**. She misused legal terminology, retroactively labeled a social media post as “**ex parte communication**” months after it occurred, and **rebranded judicial complaints, records requests and court filings as harassment**. She used **taxpayer-funded court infrastructure to execute a personal vendetta, which constitutes misuse of public resources**.

This retaliatory filing was part of a broader campaign of procedural abuse. Jackson repeatedly denied Gerlach’s motions with one-word rulings, disposed of evidentiary exhibits without review, and publicly accused Gerlach of “pretending” to be a victim on a public record—despite law enforcement documentation confirming Gerlach and her child as victims of domestic violence and child abuse. Jackson made public statements about Gerlach’s credibility after recusal, violating judicial ethics rules and further undermining the integrity of the proceedings.

Jackson also falsely claimed in sworn filings that she had no control over the courtroom’s FTR audio system, despite multiple cases documenting missing or altered recordings during critical hearings. She denied muting the system, yet failed to investigate or preserve the audio, even when Gerlach and other litigants contacted court security. Jackson’s sworn denial was contradicted by operational

protocols and her own courtroom's history of audio suppression. Her failure to act in response to repeated complaints supports the inference of deliberate tampering with public records.

In a December 2022 Phoenix New Times article, Jackson publicly identified herself as both a Maricopa County Superior Court Judge and an attorney representing the Hualapai Tribe—despite **Rule 3.10 of the Arizona Code of Judicial Conduct**, which prohibits judges from practicing law. This dual role was never disclosed in her judicial application, nor is it listed in her official biography or resume. Her time as a Judge for the Hualapai Tribe was also not disclosed in her official resume or application to become a Superior Court Judge. Because judicial applications are submitted under penalty of perjury, this omission constitutes a material falsehood and may reflect intentional concealment of prior misconduct, ongoing misconduct, or conflicts of interest.

In another case, Jackson denied a continuance for a seriously ill attorney based on a “**gut reaction**,” calling the illness “**fortuitous**.” When Gerlach cited this ruling in her public advocacy, Jackson labeled her a “liar”—despite the fact that a granted Motion for Change of Judge, filed by a licensed attorney, quoted Jackson’s “**gut reaction**” directly. If Jackson believed the attorney fabricated the statement, she had a mandatory duty under **Rule 2.15(A)** to report the attorney’s misconduct. She did not. Her failure to act confirms that Gerlach’s citation was truthful and that Jackson’s retaliatory accusation she filed under penalty of perjury while identifying as a Superior Court Judge was baseless.

While presiding over Erin Gerlach’s case, Judge Charlene Jackson simultaneously engaged in a criminal investigation targeting Gerlach—an investigation initiated by the opposing party’s employer, a law enforcement agency. This undisclosed dual involvement created a serious conflict of interest and raises credible concerns about **collusion**, **judicial retaliation**, and **misuse of state resources**. Jackson later claimed knowledge of Gerlach’s private address linked to anonymous speech yet failed to disclose how she obtained that information through lawful means. Taken together, these actions reflect a disturbing pattern in which judges appear to be targeting critics through coordinated retaliation, undermining the integrity of the judiciary and threatening the constitutional rights of those who expose misconduct while violating numerous state and federal laws.

Judge Jackson, while under oath, also claimed that the Commission on Judicial Conduct placed Gerlach under surveillance after threatening to go to the media about her child custody case. The coordination between Judge Jackson and Commission staff in conducting surveillance and retaliation raises potential violations of **A.R.S. § 13-201 (Official Misconduct)**, **§ 13-2313 (Computer Tampering)**, **§ 13-3002 (Aggravated Stalking)**, Arizona and Federal conspiracy statutes.

Moreover, the Commission—made up largely of judges and attorneys subject to the same ethical rules as Judge Jackson—failed to enforce her recusal obligations. Under the Arizona Code of Judicial Conduct, a judge must disqualify herself whenever her impartiality could reasonably be questioned. Yet despite evidence that Judge Jackson orchestrated surveillance of Gerlach, participated in law enforcement investigations, and retaliated against her, Jackson continued to preside over the domestic relations proceedings for more than two years. This refusal to require recusal constitutes a grave abdication of the Commission's statutory oversight duties and reveals a troubling lack of impartiality on the part of both the Commission and Judge Jackson.

Judge Charlene Jackson made a sworn statement asserting that she had issued only one warrant in her entire career as a Superior Court Judge—a claim that is demonstrably false based on publicly available court records. This material misrepresentation under oath constitutes **perjury** under **A.R.S. § 13-2702**, which criminalizes knowingly making false statements in official proceedings. As a sitting judge, Jackson is held to the highest standard of truthfulness, and her deliberate lie violates **Rule 1.1 (compliance with the law)**, **Rule 2.16(A) (honesty in official statements)**, and **Rule 1.2 (promoting confidence in the judiciary)**. In the broader context of her retaliatory conduct and pattern of concealment, this falsehood cannot be dismissed as error—it reflects a calculated attempt to mislead the tribunal in her quest for a retaliatory civil harassment restraining order and to obstruct accountability.

Jackson also denied ever presiding over a case involving her niece, Paige Jackson. However, the official Maricopa County docket listed Judge Charlene Jackson as the assigned judicial officer, and the case was reassigned on the same day Gerlach's case was reassigned—just hours after Gerlach submitted misconduct

evidence to the Arizona Supreme Court. Jackson's denial directly contradicts the public record. If she knowingly lied, it constitutes perjury; if she was unaware, it raises serious concerns about her competence and oversight of her own division. Regardless, if the official court website showed Jackson assigned to her niece's case, Gerlach was not a "liar" for exposing that information. Citizens are entitled to rely on the accuracy of official court records, and it would be an extraordinary coincidence if the case had been mistakenly assigned to Jackson's docket. Speaking publicly about this connection is protected under the **First Amendment** and therefore should not be used to obtain a Civil Harassment Restraining Order.

Even assuming *arguendo* that the docketing error originated from internal court systems and that Judge Jackson was never substantively involved in the case, the public identification of her as the assigned judicial officer is a matter of official record. Gerlach's disclosure of this information—drawn directly from the court's own docket—cannot reasonably be construed as harassment. The presumption of accuracy in judicial records is foundational to public trust in the legal system. To characterize the dissemination of such information as malicious or conspiratorial is to misrepresent both the nature of the disclosure and the legal protections afforded to individuals engaged in public oversight of judicial conduct.

Importantly, Gerlach did not allege that Judge Jackson issued rulings or took substantive action in her niece's case. Her assertion was limited to the fact of assignment, as reflected in the official Maricopa County Superior Court records. Moreover, according to court records, Gerlach brought this issue to the attention of Judge Jackson in formal briefs and notified multiple judicial authorities, including Presiding Judge Joseph Welty, Presiding Judge Ronda Fisk, and former Presiding Judge Bruce Cohen. She also filed a formal complaint with the Arizona Commission on Judicial Conduct. In addition, Gerlach submitted motions in Judge Jackson's courtroom that raised this and other allegations of misconduct. These motions were summarily denied by Judge Jackson without explanation.

If the docket entry was erroneous, Judge Jackson had multiple opportunities to correct the record or clarify the assignment—whether in response to Gerlach's filings, through internal administrative channels, or in communication with the presiding judges. Her decision to remain silent throughout these proceedings and only address the issue months later—within the context of a restraining order petition—raises serious questions about her motives and the credibility of her denial.

Jackson's attempt to reframe Gerlach's disclosure as defamatory or conspiratorial—despite corroborating evidence and Gerlach's reliance on official

court records—suggests either a fundamental misunderstanding of the boundaries of protected speech or a deliberate effort to suppress public accountability. Such conduct warrants close examination as a sitting judge should understand and respect constitutional protections for civic oversight.

Rather than address the evidence, Jackson went on the offensive. She used her judicial title in a sworn restraining order to publicly label Gerlach a “liar” and “conspiracy theorist” for exposing the familial conflict—despite multiple individuals independently verifying the docket listing on the official Maricopa County Superior Court website. Gerlach disclosed this conflict multiple times: in Jackson’s courtroom, to the Presiding Judge, and to the Commission on Judicial Conduct. After every agency failed to act and her complaints were ignored, she disclosed the conflict publicly. Jackson remained silent throughout the judicial process, never disclosed the familial connection, never recused herself, and never corrected the record. She denied the connection only in a personal legal filing months later. This sequence confirms Jackson was aware of the allegation, chose not to address it while acting as a judge, and retaliated only after losing jurisdiction over Gerlach’s case. It is yet another concealed grievance against Gerlach that directly undermines the fairness and legality of all Jackson’s rulings she issued in Gerlach’s case.

Judge Charlene Jackson’s misconduct extends beyond isolated rulings and into a coordinated pattern of retaliation, deception, and abuse of judicial authority. In her March 2025 restraining order application, Jackson claimed that a social media post allegedly published by litigant Erin Gerlach in October 2024 constituted “**ex-parte communication.**” Yet Jackson never raised the issue in court, never entered it into the record, and never recused herself. Instead, she waited five months—until after her recusal and cited the post retroactively as justification for a personal legal action. **This maneuver reframed protected public speech as improper contact, and in doing so, Jackson admitted under penalty of perjury to violating her own judicial ethics.**

If Jackson genuinely believed the post constituted “ex-parte communication,” she had a legal and ethical duty to (1) disclose the incident immediately, (2) enter it into the case record, and (3) recuse herself from further proceedings. She did none of these. Her silence at the time tells one of two stories: either she did not consider the post ex-parte when it occurred and is now weaponizing it retroactively, or she

knowingly violated judicial ethics by continuing to preside over a case where she believed she had been improperly contacted.

Either scenario reflects misconduct and a violation of the Arizona Code of Judicial Conduct.

Jackson's disregard for evidence and due process is equally alarming. She admitted in a minute order that she disposed of Gerlach's exhibits without reviewing or admitting them into evidence. Despite this, she claimed Gerlach fabricated her victimhood—without ever weighing the evidence. **On a public record, in her sworn application for a restraining order, Jackson, in her personal capacity but identifying herself as a Superior Court Judge accused Gerlach of “pretending” to be a victim of domestic violence.** Meanwhile, Gerlach submitted extensive, corroborated evidence from law enforcement agencies in both Arizona and California, including police reports, photos, videos, victim rights forms naming Brooklyn and Gerlach as victims, and a charging worksheet from the Los Angeles District Attorney confirming that the only reason Brooklyn's father wasn't charged with domestic battery was the 1-year expiration of the statute of limitations. These are official records. For Jackson to claim Gerlach fabricated her victimhood is to imply that multiple law enforcement agencies and prosecutors across two states are all lying. That is not just arrogant—it is dangerous. Jackson has publicly stated that she is prohibited from commenting on pending cases. Yet in her own filing, she made sweeping accusations about Gerlach's credibility, proving her bias and revealing a concerning personal interest in a case she had already recused from. Further, the defamatory statement had no substance to Jackson's restraining order application and was placed on the record for the purpose of influencing Gerlach's ongoing child custody and criminal custodial interference cases.

In one of the most troubling and bizarre claims made in her sworn restraining order filing, Jackson accused Gerlach of anonymously sending packages to the private residences of other judicial officers. According to Jackson, she received a telephone call from a fellow judicial officer telling her about the packages that were delivered. Allegedly, the packages contained materials exposing corruption within the Maricopa County Family Court system—some referencing Gerlach's case and other cases, naming multiple judges, including Jackson herself. Gerlach has publicly and consistently denied any involvement, stating she had no knowledge of the deliveries, and there is no publicly available evidence linking her to the act.

While still assigned to Gerlach's custody case, Jackson admitted to participating in a criminal investigation into Gerlach's alleged connection to the packages. That investigation was conducted by the same law enforcement agency where the opposing party in Gerlach's case is employed—an agency that, by Jackson's own admission and Judge Ronda Fisk's ruling, has no jurisdiction over Jackson's residence, Gerlach's residence, or the courthouse. Despite this jurisdictional conflict, Jackson met with investigators from that agency while presiding over Gerlach's case and failed to disclose her involvement until well over a year later in her restraining order filing. This undisclosed participation represents a clear conflict of interest and a breach of judicial neutrality.

Jackson further admitted under oath that she was not a recipient of the packages, yet she inserted herself into a controversy and criminal investigation and publicly named Gerlach as the sender. This reckless accusation interfered with any legitimate criminal investigation and ensured that IF a real suspect exists, they are unlikely to be brought to justice. Her actions either obstructed an active investigation or fabricated one where no crime had occurred. Most disturbingly, Jackson admitted in her sworn filing that other judges—not just herself—are using a specific police department, the same one employing Gerlach's opposing party, to obtain personal information about their critics who exercise their First Amendment Right to Free Speech online. This admission points to a coordinated effort among judicial officers to surveil, intimidate, and retaliate against individuals engaged in lawful oversight and protected speech. Jackson admitted to her and her judicial colleagues abusing their authority by using law enforcement to investigate lawful dissent, wasting taxpayer resources for personal gain. Jackson's accusation, made without evidence, under oath, and while identifying herself as a sitting Superior Court Judge, is defamatory, retaliatory, and emblematic of a broader abuse of power. It reflects not only an intentionally concealed personal bias that existed throughout the entire Gerlach matter but a systemic pattern of judicial misconduct that undermines public trust and obstructs accountability.

Judge Charlene Jackson engaged in a sustained campaign of judicial retaliation, judicial harassment and procedural abuse designed to obstruct proceedings, suppress oversight, and manipulate the treatment of litigant Erin Gerlach and her daughter across multiple legal forums.

Jackson repeatedly weaponized service of process to interfere with active litigation, influence judicial officers and to intimidate Gerlach. She was served with Jackson's

civil restraining order during two separate court appearances, spaced more than a month apart. Each service was strategically timed to influence the assigned judicial officer. Jackson escalated further by orchestrating seven separate service attempts, including multiple times while Gerlach was incarcerated in California and after extradition to Arizona. These efforts were not only excessive but deliberately timed to affect how Gerlach was perceived and treated while in custody. By serving her in jail, Jackson ensured that correctional staff and judicial officers were repeatedly exposed to the narrative that Gerlach posed a threat to a sitting judge. This tactic was designed to manipulate Gerlach's conditions of confinement and inject bias into unrelated proceedings.

The repeated service of Jackson's restraining order—including while Gerlach was incarcerated—was not a procedural necessity. It was a strategic maneuver to manipulate Gerlach's treatment in custody, reinforce a false narrative, and influence judicial officers overseeing her criminal case. These actions required unnecessary deployment of court personnel, law enforcement, and administrative resources, all for the advancement of Jackson's personal grievance. This constitutes a gross misuse of judicial and taxpayer resources and a diversion of state power for private retaliation.

Judge Jackson engaged in deliberate coordination with the opposing party in Erin Gerlach's case to repeatedly serve her with the same restraining order. This conduct reflects a calculated effort to overwhelm the respondent, reinforce a false narrative of threat, and exert undue influence over judicial officers presiding in Gerlach's custody and criminal matters. The repeated service was not a procedural necessity—it was a strategic pattern of harassment designed to distort perception and obstruct fair process while attempting to intimidate Gerlach into silence.

Court records show Jackson's civil filing was cited by prosecutors during Gerlach's initial appearance, where they suggested stricter bond conditions based on alleged harassment of a Superior Court Judge. Jackson influenced prosecutorial decisions and judicial proceedings based on a fabricated, retaliatory civil restraining order. This demonstrates that Jackson's restraining order was not merely retaliatory. It was a tactical instrument used to shape prosecutorial posture, judicial perception, and Gerlach's treatment in custody. All of this was done to advance Jackson's personal grievance. This constitutes a gross misuse of judicial and taxpayer resources and a diversion of state power for private retaliation.

Jackson was fully aware that her documented misconduct would be placed on the record in Gerlach's criminal case. The injunction functioned as a preemptive strike: a calculated effort to intimidate Gerlach into silence and discredit her before she could publicly document the judicial misconduct at issue.

But the effort backfired. Judge Jackson's sworn statements inadvertently corroborated Erin Gerlach's longstanding allegations of collusion, bias, and retaliation. The criminal proceedings are now exposing a broader pattern of fraud on the court—perpetrated by Gerlach's opposing party, Officer Freeman; his attorney, Caitlin Andrade; and ratified by Judge Jackson. This includes Freeman's filing of knowingly false police reports, false statements submitted under penalty of perjury to courts in three separate jurisdictions, and repeated false statements to law enforcement.

What was once concealed through institutional privilege is now being dragged into open court, where each falsehood, each abuse of process, and each ethical violation will be documented and litigated.

Jackson's misconduct extended beyond service abuse. In sworn filings, she admitted to discussing Gerlach's case with individuals outside the courtroom, despite acknowledging elsewhere that such commentary is unethical. She inserted herself into Gerlach's custodial interference case, a matter she was not assigned to, and disclosed sensitive information about it in a public record while actively serving as a sitting judge. Jackson knew more about Gerlach's case than she did. These disclosures violated confidentiality, judicial neutrality, and the public's expectation of impartiality. They also damaged Gerlach's legal position and confirmed Jackson's longstanding bias. Upon information and belief, it appears Judge Jackson not only participated in law enforcement investigations and allowed her favored police to intimidate and dissuade Gerlach's participation in her own domestic relations case. But Jackson may have participated as a confidential informant while she simultaneously presided over the domestic relations matter.

Judge Charlene Jackson remains actively and improperly involved with Erin Gerlach's opposing party, working in concert to escalate punitive action through the criminal justice system. Jackson has urged authorities to raise Gerlach's bond or detain her based on fabricated claims of harassment—claims that are unsubstantiated, retaliatory, and strategically timed to criminalize dissent. Jackson's civil restraining order is being used as leverage in Gerlach's criminal case, cited by prosecutors to justify suggesting harsher conditions and portray Gerlach as a threat to the judiciary. This influence over law enforcement and

prosecutorial posture reflects a coordinated effort between a sitting judge and the opposing party to suppress oversight, obstruct justice, and intimidate a mother into silence for lawfully exposing misconduct.

This is not impartiality. It is collusion. And it is being done with the full backing of Maricopa County. The County Attorney's Office's failure to intervene or prosecute the criminal violations committed by both Gerlach's opposing party and Judge Jackson raises serious concerns of prosecutorial misconduct. These actions potentially violate ABA Rule 3.8, which outlines the special responsibilities of a prosecutor, and Arizona Rules of Professional Conduct, ER 8.4(d), which prohibits conduct prejudicial to the administration of justice.

Judge Charlene Jackson's conduct represents a sustained and deliberate abuse of judicial power. Her actions were not the result of error or oversight—they were calculated, coercive, and executed under color of law to punish a whistleblower, distort legal outcomes, and ensure punitive treatment of a mother who lawfully exposed systemic misconduct. This was not impartial adjudication. It was judicial harassment, procedural sabotage, and a direct assault on the integrity of the justice system.

In pursuit of a personal vendetta, Jackson filed a knowingly false restraining order in her individual capacity. By doing so, she stepped outside the bounds of her judicial role and forfeited the protections of judicial immunity. Her filing was not grounded in fact or law—it was a retaliatory maneuver designed to silence criticism, discredit a litigant, and shield herself from accountability. It was also selfishly motivated: **Jackson sought to silence a mother who was exposing her misconduct so that her own violations could remain concealed from public scrutiny.**

Jackson knowingly submitted false statements under oath while simultaneously attacking a litigant engaged in lawful oversight. She violated multiple ethical and legal standards and inflicted measurable reputational and emotional harm. Her misconduct spans perjury, record tampering, suppression of evidence, conflict of interest, and abuse of process. She used her judicial title to intimidate, defame, and retaliate—weaponizing the bench to obstruct oversight and suppress constitutionally protected speech.

The criminal charges against Erin Gerlach stem directly from a series of fraudulent court orders issued by Jackson—orders entered without proper

jurisdiction, in violation of Gerlach and her child's constitutional rights, and in full view of egregious perjury committed by Gerlach's opposing party that he committed while identifying himself as a law enforcement officer. Jackson knowingly allowed false statements to stand unchallenged, ignored admissible evidence, and facilitated a fraud on the court that laid the foundation for the custodial interference case now pending against Gerlach. Despite having recused herself from the custody matter, Jackson remains actively involved in influencing law enforcement and prosecutorial decisions.

Judge Charlene Jackson's misconduct is no longer confined to her courtroom—it is infecting the entire Maricopa County judicial system. Her abuse of power has triggered a chain reaction that is now dragging prosecutors, judges, law enforcement, and fellow judicial officers into a legal and ethical disaster of her own making.

Prosecutors in Erin Gerlach's criminal case relied on Jackson's authority, unaware they were acting on the word of a judge who knowingly lied. The restraining order Jackson filed is riddled with deceitful misrepresentations, intentional omissions, and flat-out falsehoods. The judge who signed it did so despite Jackson's blatantly false claim that she has no control over the FTR audio system in her courtroom—a claim every judicial officer knows is a lie. Jackson also asserted that filing complaints, submitting public records requests, and engaging in lawful dissent constituted harassment. That is a direct violation of the First Amendment, and every legal professional involved knows it.

In her sworn filing, Jackson named multiple other judicial officers—dragging them into a sham civil proceeding where Gerlach is preparing to exercise her constitutional right to confront her accusers. Their identities and involvement will be exposed in court. Jackson's misconduct is not just retaliatory. It is contaminating the integrity of the judiciary and exposing her colleagues to reputational damage, legal scrutiny, and civil liability for enabling or endorsing her abuse of power and abuse of process.

It gets worse. Investigators have obtained private information and personal data on behalf of Jackson—and, according to her own sworn statements, on behalf of other judicial officers as well. This raises serious concerns about unlawful surveillance, misuse of law enforcement resources, and coordinated retaliation against critics engaged in protected speech. Those officers are now entangled in

Jackson's civil restraining order case, pulled into a scheme that violates constitutional rights and exposes them to public accountability.

This is not just a judicial ethics crisis. It is a systemic liability event. Jackson's coordinated retaliation, abuse of process, and constitutional violations have implicated law enforcement, prosecutors, attorneys, judicial administrators and several other agencies who either failed to intervene, knowingly participated or knowingly enabled her misconduct. The longer these institutions remain complicit, the deeper their exposure and liability become.

The consequences of Judge Charlene Jackson's misconduct extend far beyond Erin Gerlach and her daughter. They ripple through every case she touched, every record she distorted, and every courtroom she compromised. Her actions have destabilized the judicial process, eroded public trust, and exposed the catastrophic danger of unchecked retaliation from the bench. The harm she caused is immeasurable. The fallout—legal, political, and institutional—will leave a permanent scar on Arizona's judiciary and mark an embarrassing scandal that will be remembered for decades.

Judge Jackson has left a stain that cannot be ignored. Her pattern of dishonesty, retaliation, and constitutional violations demands immediate and uncompromising accountability. This is not a matter of discretion. It is a matter of justice. And justice will not wait. Jackson's misconduct has inflicted real harm on real people, including Arizona's most vulnerable population: children.

The public will be outraged when they learn the truth. While missing children remain unfound, sex trafficking networks go uninvestigated, violent crimes sit unresolved, and schools go without adequate security or resource officers due to lack of funding, law enforcement is wasting taxpayer dollars chasing down internet articles that break no laws—simply because judicial officers demand to know who their critics are. Public resources are being diverted away from real emergencies to retaliate against whistleblowers, silence lawful dissent, and protect the reputations of those abusing their power. Meanwhile, these same officials are asking for tax hikes to bankroll their vendettas. This is not justice. It is a grotesque misuse of authority, a betrayal of the public trust, and a stain on every institution that enables it. We will not be intimidated into silence. We will not back down. And we will not stop until Judge Charlene Jackson is held fully accountable. Every agency, every officer, and every institution that enabled her will answer for

their complicity. This is not just about one judge. It is about restoring integrity to a system that has been weaponized against the very people it was meant to protect

Judge Charlene Jackson's misconduct didn't just spark outrage—it ignited a statewide reckoning. Over **2,470 people** have signed a **public petition** demanding her removal from the bench, but the public response didn't stop there. Legislators and senators got involved after multiple constituents came forward with consistent, credible, and deeply alarming reports of Jackson's conduct. She has been publicly accused of repeatedly violating the law, trampling constitutional rights, placing children in danger, financially bankrupting families, and colluding with court-ordered providers.

These weren't isolated incidents. They revealed a pattern of abuse so egregious that lawmakers had no choice but to act. That's how the **Ad Hoc Committee on Family Court Orders** was formed—not out of politics, but out of necessity. Jackson's misconduct was harming families across Maricopa County, and the damage was too widespread to ignore.

What began as a local crisis has now become a national movement. The Ad Hoc Committee has sparked reform efforts across the country, and every lawmaker, advocate, and official involved knows exactly where it started—with Maricopa County Superior Court Judge Charlene Jackson and her gross abuse of authority.

Let that sink in, a sitting judge's behavior was so corrupt, so constitutionally offensive, that it triggered bipartisan legislative action and exposed the deep rot within Arizona's family court system, now on display in all 50 states. Constituents didn't just demand reform—they proved it was necessary. They brought the truth to light. And now, Judge Jackson is the face of a judicial scandal that will define Arizona's legal crisis for years to come.

This complaint respectfully requests a formal investigation, comprehensive disciplinary review, and referral to appropriate state and federal authorities. The violations outlined herein are extensive, well-documented, and indicative of a sustained abuse of judicial power that demands immediate institutional response. A second complaint is forthcoming, containing additional allegations supported by substantial evidence drawn from public court filings submitted by multiple litigants who have experienced similar misconduct and harm in Judge Jackson's courtroom.

Allegations of Misconduct

The following is a summary of specific allegations concerning Judge Jackson's conduct over approximately the last two and a half years. According to the Arizona Code of Judicial Conduct, the pattern of her conduct constitutes egregious judicial misconduct warranting discipline.

Overview of Misconduct

The following conduct is documented and supported by sworn statements, court records, and corroborating evidence:

- **Knowingly filed a false restraining order in her personal capacity.** Jackson targeted former litigant Erin Gerlach. By acting outside her judicial role, Jackson forfeited judicial immunity and weaponized the civil process to retaliate against a mother engaged in lawful oversight and dissent. Her filing was not grounded in fact or law—it was a personal vendetta disguised as a judicial act where she involved multiple third parties including law enforcement, fellow judicial officers and several agencies including the Judicial Performance Review board and the Commission on Judicial Conduct in her fraudulent scheme.
- **Submitted false statements under oath,** including the demonstrably untrue claim that she has no control over the FTR audio system used in her courtroom. This statement is provably false and known to be inaccurate by every judicial officer familiar with courtroom operations. Jackson also claimed to have only issued 1 warrant during her time as a Superior Court Judge which is also untrue.
- **Retaliated against Gerlach for exercising her Constitutional Rights,** Judge Charlene Jackson retaliated against Erin Gerlach for exercising her constitutionally protected rights—including filing judicial complaints, submitting public records requests, initiating a recall petition, and engaging in lawful dissent. Rather than respecting these rights, Jackson deliberately mischaracterized them as “harassment” in her civil filings, a move that directly violates the First Amendment and exposes a dangerous abuse of judicial authority.

This conduct alone is disqualifying. A judge who cannot distinguish between protected civic engagement and personal attack has no business presiding over the rights of others. Jackson’s actions prove exactly why Gerlach—and many others—believe she is unfit for judicial office. When a sitting judge reframes lawful oversight as a threat, it’s not just misconduct. It’s a betrayal of the Constitution and a clear signal that she must be removed from the bench. Especially when Judge Jackson is knowingly and intentionally reframing Constitutionally Protected speech as “harassment” to conceal her own misconduct.

- **Coordinated with Gerlach’s opposing party**, resulting in synchronized restraining order filings, repeated and excessive service attempts—including while Gerlach was incarcerated and a deliberate effort to manipulate judicial proceedings. These tactics were designed to portray Gerlach as a threat and influence her treatment by law enforcement and the courts.
- **Interfered with active litigation and criminal proceedings**, Judge Charlene Jackson interfered with active litigation and criminal proceedings by weaponizing her civil restraining order to influence prosecutorial decisions and judicial posture. Her filing—riddled with falsehoods and personal bias—was cited by prosecutors to justify recommending stricter bond conditions against Erin Gerlach, despite lacking factual or legal merit.

While still presiding over Gerlach’s case, Jackson met with investigators from the same law enforcement agency that employs Gerlach’s opposing party to discuss a bizarre and unsubstantiated allegation that Gerlach anonymously sent packages to judges’ private residences containing materials critical of the court. Jackson was not a recipient of these packages and had no direct involvement—she interjected herself into the investigation while actively overseeing Gerlach’s case. This off-record coordination reflects a clear conflict of interest, a breach of judicial neutrality, and unmistakable bias against a litigant.

In addition, Jackson issued **summary one-word denials** in response to every motion Gerlach filed, regardless of merit or legal basis. These blanket denials, issued without explanation, further demonstrate her bias and refusal

to engage with the substance of Gerlach's legal arguments. This pattern of dismissiveness proves that any orders issued by Jackson in Gerlach's case are tainted by personal animus and judicial misconduct. Her rulings cannot be trusted, and her continued involvement in the case undermines the integrity of every proceeding she touched.

- **Named multiple judicial officers in her restraining order** In her sworn restraining order filing, Judge Charlene Jackson referenced multiple judicial officers, claiming they contacted her about online articles written about Jackson and alleged anonymous package deliveries—but she did not name them. By invoking unnamed judges as supporting witnesses to her claims, Jackson effectively inserted members of the judiciary into a retaliatory, fraudulent proceeding.

Gerlach is now preparing to contest the restraining order. Under her constitutional right to confront her accusers, Jackson will be required to identify the judicial officers she named in her petition. Gerlach does not believe these individuals exist and asserts that Jackson may have fabricated the claims to falsely bolster her filing and deflect scrutiny from her own conduct—specifically, her use of court resources, law enforcement contacts, law enforcement resources, Gerlach's opposing party and his agency, and possibly her husband to surveil, stalk and retaliate against her.

Jackson's own sworn statements confirm that court security allegedly approached her about Gerlach's public dissent, which is lawful and protected. Critically, Jackson omitted that Gerlach, along with other litigants had contacted court security to report missing, muted, or altered courtroom audio and request access to the courtroom recordings. This concealment of material facts, combined with vague accusations and off-record coordination, reflects a deliberate abuse of process and a serious breach of judicial ethics.

- **Colluded with court-ordered providers**, enabling biased evaluations, financial exploitation, and retaliatory recommendations that harmed families and placed children in danger. These providers acted in concert with Jackson's courtroom directives, raising serious concerns about conflict of interest and systemic abuse.

- **Continued to interfere in Gerlach's criminal case after recusing herself from the custody matter**, violating **Rule 2.11** of the Arizona Code of Judicial Conduct. Her ongoing involvement included influencing prosecutorial posture and communicating with officials about Gerlach's case.
- **Discussed pending cases with third parties**, violating **Rule 2.10** and compromising judicial neutrality. Jackson admitted in sworn filings to speaking about Gerlach's case outside of court, despite acknowledging elsewhere that such commentary is unethical and prohibited.

Violations of the Arizona Code of Judicial Conduct

Canon 1. A judge shall uphold and promote the independence, integrity, and impartiality of the judiciary and shall avoid impropriety and the appearance of impropriety.

Violations of Rule 1.1. Compliance with the Law

Violation	Description
False sworn statement about warrant issuance	In her restraining order affidavit, Jackson claimed she had issued only one warrant in her career. Public records show she issued multiple warrants, including more than one in Gerlach's case. Knowingly making a false statement under oath—even if not material—is a criminal offense and violates Rule 1.1.
False sworn denial of presiding over niece's case	Jackson denied under oath that she presided over her niece's case, despite docket records listing her as the assigned judge. This is a material falsehood made under oath and violates both criminal law and judicial ethics. This false denial under oath violates both perjury laws and conflict-of-interest rules.
Presiding over a case involving a close relative without disclosure or recusal	Judges must recuse themselves from cases involving family members. Jackson's failure to disclose and recuse created an appearance of bias and violated impartiality standards.
Altering or suppressing court records	Multiple litigants, including Gerlach, documented missing or manipulated FTR audio files and altered minute entries. Jackson falsely denied control over the system, but affidavits and motions suggest a pattern of record tampering. Missing or manipulated FTR audio and altered minute entries suggest intentional concealment of judicial misconduct, violating laws governing public records and transparency.
Issuing rulings after jurisdiction was divested	Jackson continued issuing orders and warrants after being served with a mandate from the Arizona Court of Appeals, which legally stripped her of jurisdiction. Jackson's continued rulings

	were legally void and violated procedural law. This issue has been reported in multiple cases assigned to Jackson.
Practicing law while serving as a sitting judge (Hualapai Tribe)	Jackson publicly identified as both a Superior Court Judge and a practicing attorney for the Hualapai Tribe. Arizona prohibits judges from practicing law while in office. Jackson's dual role with the Hualapai Tribe violates statutory and ethical prohibitions on dual roles for sitting judges.
False or misleading judicial application	Applications for judicial appointment require full disclosure of all prior judicial roles, legal employment, and professional affiliations. Jackson's failure to list her service as a tribal judge and attorney violates these disclosure standards.
Failure to disclose extrajudicial activities	Judges must disclose any compensated or professional activity outside the bench. Jackson's active role with the Hualapai Tribe should have been disclosed both during her application and while serving.
Unlawful access or misuse of protected data	Jackson claimed in her sworn affidavit that an anonymous article was linked to Gerlach's home address on a platform called Medium. Medium does not collect or publish such data, raising serious concerns about unauthorized access to protected information and who she is colluding with to obtain it.
Misrepresentation of facts in sworn filings	Jackson's restraining order included multiple factual inaccuracies, including speculative accusations and unsupported claims about Gerlach's conduct, violating her duty to uphold truth and legal integrity. Knowingly submitting false statements under oath violates both criminal law and judicial ethics.
Failure to comply with statutory hearing requirements	Jackson failed to hold evidentiary hearings required under A.R.S. § 25-411 and A.R.S. § 25-406 before modifying custody orders or appointing evaluators, violating procedural law and due process.
Unilateral modification of stipulated orders without due process	Jackson altered custody arrangements and parenting time orders without notice or hearing, violating A.R.S. § 25-317 and basic due process protections.
Issuing rulings based on "gut reactions"	

	Judicial decisions must be based on law and evidence. Denying a continuance for a seriously ill attorney based on a “gut reaction” disregards legal standards and violates fair process. Disregarding medical documentation and violating legal standards for judicial decision-making. Judicial decisions must be based on law and evidence.
Misuse of judicial office for personal gain	By omitting her tribal employment, Jackson concealed a dual role that could influence her judicial decisions, violating the prohibition on using public office for private advantage.
Retaliating against litigants who filed appeals	Jackson issued warrants and punitive rulings shortly after Gerlach filed complaints and appeals, suggesting retaliation under color of law.
Conducting hearings without proper notice	Jackson held a UCCJEA conference without proper notice (a few hours via email) or opportunity for parties to be heard, violating statutory procedural protections.
Ignoring evidence of abuse and threats	Jackson disregarded documented evidence of domestic violence, child abuse, and stalking, placing victims in harm’s way through judicial orders.
Issuing non-appealable orders lacking mandatory statutory findings	Jackson issued orders an order on jurisdiction lacking the mandatory statutory findings required during a UCCJEA Conference. Jackson intentionally placed that ruling and others in minute entries with zero findings, effectively blocking appellate review and violating due process and equal protection rights.
Ignoring or condoning perjury and fraud on the court	Jackson allowed false testimony and fraudulent filings to stand, refusing to vacate orders obtained through deceit, violating her duty to uphold justice.
Interfering with Gerlach’s criminal custodial interference case	Jackson is currently interfering with proceedings, obstructing and manipulating investigations, and influencing judicial officers.
Using vulgar or unprofessional language in court	Jackson’s use of inappropriate language in official proceedings undermines public trust and violates standards of judicial decorum.

Violations of Rule 1.2 – Promoting Confidence in the Judiciary

Allegation	Description
Retaliatory restraining order	On March 24, 2025, Judge Charlene Jackson filed a personal restraining order against litigant Erin Gerlach, citing eight alleged incidents of “harassment” that occurred while Jackson was presiding over Gerlach’s custody case. The order was filed four months after the last alleged act and included multiple demonstrably false statements under oath. Jackson claimed she had issued only one warrant in her career, denied presiding over her niece’s case, denied muting courtroom audio, and retroactively labeled a social media post as “ex parte communication.” These claims were contradicted by public records, court filings, and sworn affidavits. Jackson used her judicial title in the filing to lend credibility to her personal grievance, mischaracterized protected speech—including judicial complaints, public records requests, and advocacy—as harassment, and omitted material facts to mislead the court. Critically, Jackson timed the filing to coincide with Gerlach’s arrest for custodial interference, creating the appearance of a coordinated effort to influence judicial perception and intimidate Gerlach into silence. The restraining order was repeatedly served in tandem with criminal proceedings, amplifying pressure and reinforcing a false narrative of threat. Filing a legally and ethically fraudulent restraining order in retaliation for protected speech undermines public confidence in judicial integrity. Jackson’s misuse of her title, court infrastructure, and legal terminology to legitimize personal retaliation reflects a gross abuse of power. Her strategic timing—coinciding with Gerlach’s arrest—suggests an intent to manipulate judicial outcomes and suppress dissent. These actions violate Rule 1.2 by eroding trust in the judiciary, weaponizing legal mechanisms against transparency, and intimidating a litigant for speaking out.
False statements under oath	In her sworn March 2025 restraining order, Judge Charlene Jackson claimed: “She [Gerlach] claims I have issued warrants for arrest which is untrue as I have issued 1 warrant in my career as a superior court judge.” This statement is

	demonstrably false. Public records show Jackson issued multiple warrants, including more than one in Gerlach’s case. Gerlach produced a redacted warrant bearing Jackson’s signature. Jackson also denied presiding over her niece’s case, making the “gut reaction” remark, and muting the FTR audio system—each denial contradicted by court records, affidavits, or filings. Jackson retroactively labeled a social media post as “ex-parte communication” months after it occurred, despite never raising it in court or recusing herself. These statements were made under penalty of perjury and used to justify a retaliatory restraining order. Knowingly making false statements under oath violates the foundational principle of judicial honesty and integrity. Jackson’s repeated misrepresentations—about her warrant history, courtroom conduct, and judicial conflicts—undermine public trust in the judiciary. Her misuse of legal terminology and judicial authority to legitimize a personal grievance reflects retaliatory intent and ethical collapse. These actions constitute perjury under Arizona law (A.R.S. § 13–2810) and misuse of judicial process under A.R.S. § 12–1809.
Criminalizing transparency	In her March 2025 restraining order, Judge Charlene Jackson reframed Erin Gerlach’s lawful oversight actions—including judicial complaints, public records requests, and advocacy—as “harassment.” She cited Gerlach’s email to the Judicial Performance Review Board requesting Jackson’s evaluations as evidence of misconduct. Most alarmingly, Jackson admitted under oath that she and the Arizona Commission on Judicial Conduct jointly contacted court security after Gerlach allegedly “threatened to go to the media” about her case. Jackson stated that court security began monitoring Gerlach’s online activity and surveilling her for threatening to go to the media and that she personally spoke with them about Gerlach’s case while still presiding over it. This coordinated surveillance effort—triggered by protected speech—constitutes retaliatory monitoring and institutional stalking. By labeling lawful oversight and protected speech as harassment, and coordinating surveillance with oversight bodies, Jackson undermines the public’s right to petition, access public records, and hold judges accountable. Her actions discourage civic engagement and transparency, violating Rule 1.2’s mandate to promote public confidence in judicial integrity. The Commission’s role in enabling surveillance rather than investigating misconduct reflects a collapse of oversight and a betrayal of its mandate. This conduct sends a chilling message to litigants and advocates: speak out, and risk retaliation.

Concealment of family conflict	Judge Charlene Jackson denied ever presiding over a case involving her niece, Paige Jackson. However, the official Maricopa County docket listed her as the assigned judicial officer. The case was reassigned on the same day Gerlach’s case was reassigned—just hours after Gerlach submitted misconduct evidence to the Arizona Supreme Court. Jackson did not disclose the familial connection, recuse herself, or correct the record. She only denied the connection months later in the restraining order against Gerlach. Her silence during active litigation and delayed denial suggest intentional concealment and undermine the fairness of her rulings.
Dual roles as judge and attorney	In a December 2022 <i>Phoenix New Times</i> article, Judge Charlene Jackson publicly identified herself as both a Maricopa County Superior Court Judge and an attorney representing the Hualapai Tribe. This admission was cited by litigant Erin Gerlach in court filings. Jackson responded by labeling the citation “harassment.” Additionally, Jackson’s judicial biography omits her work for the Hualapai Tribe and her prior role as an Appellate Judge—omissions that may constitute perjury under judicial disclosure rules. Misrepresenting or concealing professional history undermines transparency and public confidence in judicial ethics. Retaliating against a litigant for citing a public record further erodes trust in judicial impartiality.
Retaliatory use of judicial title	Judge Charlene Jackson filed a personal restraining order against Erin Gerlach while identifying herself as a sitting Superior Court Judge, repeatedly referencing her judicial status throughout the sworn filing and legal pleadings. She labeled Gerlach’s protected filings, public records requests, and advocacy as “harassment,” using the authority of her judicial position to silence a litigant who sought oversight and transparency. Jackson explicitly named former Presiding Judge Bruce Cohen and anonymously referenced other judicial officers to bolster her claims, thereby implicating the judiciary in her personal grievance. She made demonstrably false statements under oath—including denying her warrant history and falsely accusing Gerlach of sending packages to judicial officers—while invoking her judicial title. Jackson allegedly lied to prosecutors in Gerlach’s criminal case while identifying as a judge, further misusing her title to influence proceedings. Most alarmingly,

	Jackson used her judicial position to obtain protected data—including addresses and identities of critics—and coordinated with court security to monitor Gerlach’s online activity after she threatened to speak to the media. This surveillance was initiated following an email from the Arizona Commission on Judicial Conduct notifying Jackson of complaints filed against her. Jackson’s use of court staff and infrastructure to surveil a litigant for exercising First Amendment rights constitutes institutional retaliation. Jackson’s invocation of her judicial title in personal filings—combined with false statements, baseless accusations, and coordination with court security—reflects a misuse of public trust and retaliatory intent. Her actions violate Rule 1.2 by eroding public confidence in judicial neutrality, weaponizing her position to suppress oversight, and implicating colleagues and court infrastructure in a personal vendetta. This conduct blurs the line between judicial authority and personal retaliation, undermining the integrity of the judiciary and sending a chilling message to litigants and advocates.
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Violations of Rule 1.3 – Avoiding Abuse of the Prestige of Judicial Office

Violation	Description
Use of judicial title in personal restraining order filing	Jackson identified herself as a “Superior Court Judge” in a sworn affidavit filed that was filled with perjury, defamatory accusations and speculations. Jackson also reframed Constitutionally Protected activities as “harassment” while identifying as a Judicial Officer. Jackson used her title to lend undue credibility to a personal grievance and influence perception.
Weaponizing court infrastructure for personal retaliation	Jackson leveraged court security and law enforcement resources to monitor Gerlach’s online activity, surveil her and stalk her in response to her filing lawful complaints with the Commission on Judicial Conduct and allegedly claiming she was going to the media about her case—actions outside the scope of legitimate judicial duties.
Filing a personal legal action based on events that	Jackson’s restraining order cited incidents that occurred while she was presiding over Gerlach’s case for at least a year,

occurred while presiding over Gerlach's case	crossing the line between judicial authority and personal retaliation.
Using judicial identity and other's judicial identity to legitimize personal claims	In her sworn filing, Judge Jackson invoked her prior rulings and judicial status to portray Gerlach's lawful oversight as harassment, using her position to legitimize a retaliatory narrative. She explicitly named former Presiding Judge Bruce Cohen and anonymously referenced other judicial officers to bolster her claims. In response, Gerlach has announced her intent to call Judge Cohen and the unnamed officers as witnesses in the restraining order proceedings, asserting her constitutional right to confront those whose conduct has been cited against her.
Influencing unrelated proceedings through judicial identity	Jackson's personal filing was strategically crafted to influence perception within Gerlach's child custody and criminal proceedings. By invoking her judicial authority, she lent undue credibility to untrue and retaliatory claims, which have since circulated among other officials. This misuse of her title not only distorted the narrative surrounding Gerlach but also exposed those officials to reputational harm and potential liability because of Jackson entangling them in her personal vendetta.
Coordinating surveillance through judicial channels	Jackson admitted that court security and law enforcement were monitoring Gerlach based on her lawful complaints and protected speech, using her judicial access to initiate and legitimize surveillance.
Dual role confusion (Hualapai Tribe)	Jackson publicly identified as both a Maricopa County Superior Court Judge and a practicing attorney for the Hualapai Tribe, raising concerns about improper use of judicial prestige in external legal matters.
Retaliatory use of judicial office to silence oversight	Judge Jackson engaged in a pattern of retaliatory conduct—including unauthorized surveillance, abusive legal filings, unlawful access to protected records, involvement in frivolous investigations, and defamatory public accusations—all aimed at silencing Gerlach's constitutionally protected oversight and speech. By leveraging her judicial authority, Jackson weaponized her position to intimidate Gerlach and suppress lawful dissent.

Failure to separate personal grievance from judicial authority	Jackson’s filing and coordination with law enforcement blurred the line between personal retaliation and official judicial conduct, violating the rule’s core intent.
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Canon 2. A judge shall perform the duties of judicial office impartially, competently, and diligently.

Violations of Rule 2.1 – Giving Precedence to the Duties of Judicial Office

Violation	Description
Filing a retaliatory restraining order based on events during her judicial tenure	Jackson initiated a personal legal action against Gerlach after stepping down, citing events that occurred while she was presiding—prioritizing personal retaliation over judicial neutrality.
Using judicial access and timing to escalate personal grievance	Jackson leveraged her insider knowledge, timing, and institutional relationships to file a restraining order that weaponized her authority against a former litigant.
Invoking judicial title in a personal filing	Jackson identified herself as a “Superior Court Judge” in a sworn affidavit, using her official status to lend undue credibility to a personal grievance.
Making false statements in a sworn legal filing	Jackson denied issuing multiple warrants and presiding over her niece’s case—both contradicted by public records—violating her duty to uphold truth and legal integrity.
Presiding over Gerlach’s case while concealing a conflict of interest	Jackson failed to disclose that she was meeting with law enforcement, security and other agencies about Gerlach for over a year while still issuing rulings. Jackson’s retroactive reframing calling Gerlach’s constitutionally protected actions harassment and cyberstalking shows she disregarded her ethical obligation to remain impartial.
Participating in a criminal investigation targeting Gerlach while still presiding	Jackson met with law enforcement and court security to discuss Gerlach’s conduct while actively ruling on her case, violating the duty to prioritize fairness.
Using court infrastructure for personal retaliation	

	Jackson coordinated surveillance and security monitoring of Gerlach in response to protected speech, diverting judicial resources for personal purposes.
Failing to recuse despite personal grievance	Jackson remained on Gerlach’s case for over a year while harboring undisclosed bias and coordinating off-record retaliation.

Violations of Rule 2.2 – Impartiality and Fairness

Allegation	Description
Continued rulings while harboring bias	Judge Charlene Jackson issued rulings against Erin Gerlach—including financial penalties, summary denials, and warrants—while actively coordinating with Gerlach’s opposing party and his law enforcement employer. Jackson later admitted she believed Gerlach was targeting and harassing her during this same period, yet she withheld that grievance from the record. Her failure to disclose this personal conflict while exercising judicial authority demonstrates actual bias and violates Rule 2.2, which requires judges to act impartially and without prejudice.
Retaliatory Rulings and Negative Dispositions	Despite harboring personal animus, Jackson continued issuing adverse rulings against Gerlach, including warrants, one-word denials and financial penalties such as attorney’s fees. These decisions were made while Jackson believed she was being targeted, yet she refused to recuse herself, compromising the impartiality required under Rule 2.2.
Denial of motions without review	Jackson summarily denied nearly every motion Gerlach filed, often with one-word responses, regardless of the seriousness of the issues raised. These motions challenged fraudulent affidavits, exposed procedural violations, and presented substantial evidence of misconduct and abuse of process. Jackson’s refusal to engage with the substance of these filings denied Gerlach meaningful judicial review and violated the principle of fairness embedded in Rule 2.2.
Undermining Due Process	Jackson’s cumulative misconduct—including biased rulings, suppression of evidence, surveillance, and retaliatory filings—

	deprived Gerlach of a fair tribunal and equal protection under the law. Her actions violated core principles of due process and judicial fairness.
Muting the courtroom audio (FTR system)	Jackson’s decision to mute the official courtroom recording obstructed the appellate record and concealed the nature of the proceedings. This undermines transparency and violates the principle of fairness, as parties and reviewing courts were denied access to a complete and accurate record.
Placing a jurisdictional ruling in a non-appealable minute entry after a sham UCCJEA conference	Judge Charlene Jackson knowingly obstructed appellate review by placing a critical jurisdictional ruling in a non-appealable minute entry without making any findings on the record—immediately following a sham UCCJEA conference that violated both Arizona law and constitutional due process. Jackson’s manipulation of procedure, suppression of mandatory findings, and strategic formatting of rulings stripped Gerlach and her child of legal protections, appellate remedy, and the right to challenge jurisdiction. It was a calculated denial of due process and a flagrant breach of judicial ethics.
Manipulating Jurisdictional Rulings to Block Appeal	Judge Charlene Jackson presided over a sham UCCJEA conference that flagrantly violated Arizona law, federal protections, and constitutional due process. The proceeding lasted less than 15 minutes and was scheduled with only a few hours’ notice via email. Parties were instructed to remain muted unless spoken to directly and were denied any opportunity to speak, present evidence, or submit materials beforehand. Jackson failed to conduct an evidentiary hearing and did not make the eight statutory findings required under A.R.S. § 25–1037(B). She removed a child—documented as a victim of abuse—from an out-of-state domestic violence restraining order without reviewing the order or hearing testimony. At the next hearing, Jackson verbally admitted to intentionally placing the jurisdictional ruling in a non-appealable minute entry, stating she “didn’t care” if Gerlach filed a notice of appeal because the ruling was deliberately formatted to evade review. That segment of the FTR audio is missing, and court security could not produce footage from the day in question. This conduct reflects deliberate procedural sabotage, destruction of evidence under A.R.S. § 13–2809, tampering with public records under A.R.S. § 13–2407, and a calculated denial of due process and appellate remedy.

Issuing Orders While Lacking Jurisdiction	After acknowledging that jurisdiction had been divested to the appellate court, Jackson proceeded with a temporary orders hearing and issued retaliatory rulings. These orders ignored testimony about child abuse and domestic violence, and her written ruling omitted any mention of domestic violence. Issuing orders without lawful authority violated both state and federal protections and stripped Gerlach of due process. Issuing orders while knowingly lacking jurisdiction is a fundamental breach of judicial duty. It violates the requirement to “perform all duties of judicial office fairly,” because Jackson was no longer legally empowered to act. Her decision to proceed anyway and to issue retaliatory rulings reflects bias, disregard for the law, and a denial of equal protection and due process.
Allowing an ex-parte warrant based on admitted intent to “surprise” Gerlach	Gerlach’s opposing party obtained a warrant three days after temporary orders were issued, while admitting in writing that Gerlach had not yet been served. The stated intent to “surprise” her deprived her of notice and the opportunity to respond, violating her right to a fair hearing.
Refusing to quash the ex-parte warrant despite evidence of dishonesty	Jackson refused to quash the warrant even after Gerlach submitted repeated evidence that the opposing party’s affidavit contained falsehoods. Her blanket denials ignored material facts and reinforced a biased posture, violating the judge’s duty to ensure fairness and correct procedural abuse
Failure to recuse during conflict	Despite being formally placed on notice through Gerlach’s court filings and a motion for change of judge, Jackson remained on the case while actively participating in investigations and surveillance efforts involving Gerlach. She coordinated with the opposing party and his employer—an agency outside the court’s jurisdiction—without disclosure. Her continued involvement under these conditions constitutes a direct breach of Rule 2.2.
Retaliatory commentary after recusal	After recusing from the custody case, Jackson filed a personal restraining order against Gerlach, in which she made untrue public statements, defamatory accusations, and speculative claims about Gerlach’s character. These comments reframed protected speech and oversight as harassment and were used to legitimize a retaliatory legal action. Jackson’s post-recusal

	conduct further undermines the fairness and integrity of the proceedings and reflects ongoing bias in violation of Rule 2.2.
Undermining Due Process and Equal Protection	Jackson’s cumulative misconduct including biased rulings, due process violations, undisclosed bias, and retaliatory filings—deprived Gerlach and her child of a fair tribunal, equal protection under the law, and rights guaranteed by the Fourteenth Amendment and the Violence Against Women Act.

Violations of Rule 2.3 – Bias, Prejudice, and Harassment

Violation	Description
Concealed bias while presiding	Jackson harbored personal animus toward Gerlach while actively presiding over her case. She later admitted in sworn filings that she viewed Gerlach’s lawful complaints and oversight as harassment. This concealed grievance compromised her neutrality and violated Rule 2.3(A), which prohibits bias in the performance of judicial duties.
Treating a litigant as a personal threat	Jackson reframed Gerlach’s protected speech and legal filings as personal attacks, portraying her as a threat in a restraining order filed after recusal. This retroactive justification confirms that Jackson perceived Gerlach as hostile while still issuing rulings, violating Rule 2.3(A) and (B) by allowing personal feelings to influence judicial conduct.
Strategic timing of retaliatory filings	Judge Charlene Jackson filed a personal restraining order against Erin Gerlach in March 2025, four months after the custody case was reassigned. The filing cited Gerlach’s protected oversight, judicial complaints, and advocacy as the basis for alleged harassment. These same concerns had been raised in Jackson’s courtroom while she was actively presiding, yet Jackson never disclosed any personal grievance or recused herself at the time. Critically, Jackson timed the filing to coincide with Gerlach’s pending criminal case, creating the appearance—and effect—of influencing the assigned judicial officer and prejudicing the proceedings. By submitting sworn allegations as a sitting judge against a litigant already facing prosecution, Jackson injected personal animus into an unrelated matter,

	weaponizing her judicial status to escalate punitive consequences. This conduct constitutes retaliatory harassment under Rule 2.3(B), which prohibits judges from using their position to engage in biased or prejudicial behavior. Jackson’s actions reflect a deliberate effort to silence dissent, punish oversight, and interfere with Gerlach’s legal defense. It is not only unethical—it is a profound abuse of judicial authority.
Public Accusations and Disclosure of Confidential Information	In her sworn restraining order, Jackson made defamatory claims and speculative accusations about Gerlach’s character, while selectively disclosing sensitive case details. These statements violated judicial neutrality and confidentiality standards, further evidencing bias.
Retaliation Against Protective Parent	Jackson’s restraining order targeted Gerlach for raising concerns about child abuse, judicial misconduct, and procedural violations relating to Jackson habitually granting custody to known abusers including those indicted for sexually molesting their own children. Using judicial authority to retaliate against a protective parent for lawful advocacy is a textbook violation.
Ignoring Evidence of Abuse and Victim Protection	Jackson systematically disregarded credible evidence of domestic violence, stalking, and child abuse. Her rulings favored the abuser and omitted findings related to victim protection, demonstrating prejudicial treatment that endangered vulnerable parties—violating Rule 2.3(A). This is a common complaint across cases in Jackson’s division.
Filing a Personal Restraining Order in Retaliation	Jackson’s restraining order was based on Gerlach’s constitutionally protected speech and filings. This act of retaliation—using judicial power to silence a litigant—constitutes harassment under Rule 2.3 and abuse of authority.
Pattern of Retaliation	Jackson continued issuing adverse rulings including financial penalties, warrants and denials after being placed on notice of Gerlach’s complaints. These rulings were punitive rather than legally grounded, violating Rule 2.3 by allowing personal grievance to influence judicial decisions.
Suppressing Free Speech	

	Jackson labeled Gerlach’s alleged public records requests, media advocacy, and judicial complaints as harassment. This framing was used to justify retaliatory legal action and suppress protected speech, violating Rule 2.3(B) and constitutional protections.
Failure to Recuse Despite Personal Grievance	Jackson remained on the case despite harboring a personal grievance against Gerlach, which she later disclosed in sworn filings. Her refusal to recuse herself despite retroactively admitted to her bias violated Rule 2.3(A) and Rule 2.11(A).
Coordinated Surveillance and Intimidation	Jackson admitted to coordinating with court security and law enforcement to monitor Gerlach’s online presence for “cyberstalking.” This surveillance targeted lawful dissent and advocacy, constituting harassment under Rule 2.3(B).
Participating in a Criminal Investigation While Presiding	Jackson met with investigators from a law enforcement agency that employed Gerlach’s opposing party while still assigned to the case. She failed to disclose this involvement, violating the duty to recuse and creating a textbook conflict of interest—an egregious breach of Rule 2.3(A) and Rule 2.11(A).
Attempting to Escalate Detention or Bond Based on Fabricated Claims	Jackson conspired with Gerlach’s opposing party and law enforcement to escalate punitive action during Gerlach’s criminal case. She urged authorities to raise Gerlach’s bond or detain her based on fabricated claims of harassment against a Superior Court Judge. Her civil restraining order was strategically timed and actively cited by prosecutors to justify recommending harsher conditions. This conduct weaponized judicial authority to criminalize dissent and silence oversight, violating Rule 2.3(B) through retaliatory harassment and prejudicial influence.
Harassment designed to influence Judicial Officers and Influence Proceedings	Jackson had Gerlach served with the restraining order while she was in court—not once, but twice—in two separate hearings over a month apart in a calculated attempt to interfere with active proceedings. She escalated further, having Gerlach served seven separate times, including while she was incarcerated, in an effort to intimidate her and manipulate her treatment. The filing was timed to influence other judicial officers presiding over Gerlach’s active cases and to taint proceedings with a false narrative. This conduct constitutes fraudulent inducement, abuse of process, and targeted harassment under Rule 2.3(B), reflecting a sustained campaign of retaliation and judicial misconduct.

Retaliatory Harassment Through Defamatory Accusation	In one of the most troubling acts of judicial retaliation, Judge Jackson accused Gerlach—under oath—of anonymously sending packages to multiple judges’ homes containing materials about court corruption. Jackson admitted she was not a recipient and offered no evidence, yet she used her judicial status to portray Gerlach as a threat to the judiciary. This baseless accusation, made in a sworn restraining order, was designed to intimidate, discredit, and escalate suspicion against a litigant engaged in lawful oversight. It constitutes retaliatory harassment under Rule 2.3(B), and reflects coordinated abuse of power, bias, and prejudice in violation of judicial ethics.
Defamatory Denial of Victimhood and Suppression of Evidence	In her sworn restraining order filing, Judge Charlene Jackson accused Erin Gerlach of “pretending” to be a victim of domestic violence—despite admitting in a prior minute order that she disposed of Gerlach’s exhibits without review. This accusation had no legal relevance to Jackson’s personal restraining order and was inserted solely to discredit Gerlach’s character. Gerlach had submitted extensive, corroborated documentation from law enforcement agencies in Arizona and California, including police reports, victim rights forms, and prosecutorial charging worksheets. Jackson’s refusal to consider this evidence, followed by public accusations of fabrication, implies that multiple agencies across two states are lying. Her commentary—made under oath, in writing, and while identifying herself as a sitting Superior Court Judge—was not only defamatory and retaliatory but strategically timed to influence the new judge assigned to Gerlach’s custody case. Jackson’s conduct reflects personal animus, judicial harassment, and a deliberate attempt to damage Gerlach’s credibility in unrelated proceedings. It violates Rule 2.3(B) and constitutes a serious breach of judicial ethics.

Violations of Rule 2.5(A) – Competence, Diligence, and Cooperation

Violation	Description
Failure to Preserve Court Records Properly	Jackson muted the FTR (For The Record) system during evidentiary hearings and contempt proceedings, obstructing the creation of a complete and reviewable record and

	appellate review. This is a clear breach of diligence in maintaining a complete and accurate court record.
Missing or altered audio files and minute entries	Multiple hearings involving Gerlach were compromised by missing recordings and modified minute entries, violating the duty to preserve and maintain accurate judicial records.
Issuing rulings based on “gut reactions”	Jackson denied a motion to continue a contempt trial for a seriously ill attorney based on instinct rather than legal review, admitting she made the decision on a “gut reaction.”
Issuing Rulings Without Proper Consideration	Jackson issued rulings, including one-word denials, warrants, and monetary penalties, without adequately reviewing motions, evidence, or filings submitted by Gerlach, reflecting negligence and lack of competence in case management.
Disposing of Gerlach’s exhibits without review	Jackson acknowledged discarding Gerlach’s submitted evidence without examining its contents, failing to exercise basic diligence in evaluating material facts.
Failure to review or address substantial evidence of fraud and perjury	Jackson ignored documented instances of fraudulent affidavits, perjury, and procedural violations raised in Gerlach’s motions, refusing to engage with the substance of the claims.
Issuing one-word denials to complex motions	Jackson repeatedly denied motions with no explanation, including those challenging judicial misconduct and evidentiary fraud, violating the duty to provide reasoned rulings.
Refusal to hold evidentiary hearings required by statute	In numerous cases Jackson failed to conduct hearings mandated under A.R.S. § 25-411 and A.R.S. § 25-406 before modifying custody orders or appointing evaluators. She also refused to hold an evidentiary hearing for the UCCJEA Conference in the Gerlach case as required by statute.
Unilateral modification of stipulated orders without due process	Jackson altered parenting time and custody arrangements without notice or hearing, violating A.R.S. § 25-317 and basic procedural diligence.

Failure to engage with appellate mandates	In another case Jackson continued issuing rulings after being served with a mandate from the Arizona Court of Appeals, disregarding jurisdictional boundaries and appellate authority.
Neglecting judicial responsibilities in favor of personal retaliation	Judge Charlene Jackson willfully neglected her core judicial responsibilities by prioritizing personal retaliation over impartial adjudication. While still presiding over Erin Gerlach’s custody case, Jackson coordinated surveillance efforts and colluded with Gerlach’s opposing party and affiliated law enforcement agencies to escalate punitive action against Gerlach. These acts were not incidental—they reflect a sustained campaign to silence a critic and punish lawful oversight. Jackson also inserted herself into criminal investigations targeting Gerlach, despite having a direct conflict of interest and an ethical obligation to recuse. Her involvement in these investigations, while actively ruling on Gerlach’s case, demonstrates a complete disregard for judicial neutrality. Rather than uphold the law, Jackson weaponized her position to advance personal animus, violating the Arizona Code of Judicial Conduct, including Rule 2.3(B) (prohibiting harassment and bias) and Rule 2.11(A) (requiring recusal in cases of personal interest or conflict). Her conduct undermines the integrity of the bench and erodes public trust in the judiciary.
Failure to correct or acknowledge procedural errors	Judge Charlene Jackson was repeatedly presented with evidence of procedural violations, statutory noncompliance, and irregularities in her rulings. Despite being placed on notice through formal filings, she took no corrective action and continued issuing orders without addressing the defects. Judge Charlene Jackson repeatedly failed to correct known procedural violations and continued issuing orders despite lacking jurisdiction and violating statutory mandates. During the UCCJEA conference, Jackson did not hold an evidentiary hearing or place the eight required findings on the record as mandated by A.R.S. § 25–1037(B). She issued a one-sentence jurisdictional ruling in a non-appealable minute entry and admitted on record that she did so intentionally to block appellate review.

	Jackson also issued ex-parte orders, including a warrant authorizing entry onto private property to seize a child, without sufficient evidence or compliance with procedural requirements. The party requesting the warrant failed to meet legal standards, yet Jackson refused to vacate the orders even after Gerlach submitted substantial evidence of dishonesty and procedural violations. After Gerlach filed a Motion for Emergency Orders, Jackson was required under <u>Arizona Rules of Family Law Procedure Rule 48(B)(3)</u> to schedule an evidentiary hearing within 10 days. Instead, she scheduled a delayed resolution management conference (RMC) and unlawfully issued an order appointing a Guardian ad Litem (GAL) from that conference—despite the fact that Arizona law prohibits judges from issuing substantive orders from status conferences. All of these actions occurred after Jackson improperly asserted jurisdiction, and to this day, the case lacks a valid jurisdictional ruling. Jackson’s refusal to follow statutory procedures, her issuance of unlawful orders, and her failure to correct known violations have deprived Gerlach and her child of their constitutional rights to due process and equal protection. Her conduct reflects a sustained abuse of judicial authority and a flagrant disregard for Arizona law
Deliberate disregard for UCCJEA jurisdictional standards	Judge Charlene Jackson presided over a sham UCCJEA conference that flagrantly violated the statutory requirements of the Uniform Child Custody Jurisdiction and Enforcement Act (UCCJEA). The proceeding lasted less than fifteen minutes, was scheduled with only a few hours’ notice via email, and denied both parties the opportunity to speak, present evidence, or submit materials beforehand. Jackson instructed participants to remain muted unless spoken to directly and failed to conduct an evidentiary hearing as required under A.R.S. § 25–1037(B). She made no findings on the record, failed to analyze jurisdictional prerequisites, and removed a child from an out-of-state domestic violence restraining order without reviewing the protective order or hearing testimony. Jackson then issued a one-sentence jurisdictional ruling and placed it in a non-appealable minute entry—later admitting that she did so intentionally to block appellate review. This conduct reflects not just negligence, but a deliberate disregard for jurisdictional diligence, statutory compliance,

	and constitutional due process. Jackson’s actions stripped Gerlach and her child of legal protections, undermined the integrity of the UCCJEA framework, and violated the core principles of judicial impartiality and fairness.
Improper Denial of Recusal Motions Despite Proven Bias	Judge Charlene Jackson repeatedly denied motions requesting her recusal, despite being formally placed on notice of personal bias and conflicts of interest. Her sworn restraining order—filed months later—confirmed the very allegations Gerlach raised in her recusal motions. Jackson accused Gerlach of harassment for actions that were lawful, protected, and already documented in court filings. She publicly labeled Gerlach a “liar” and “conspiracy theorist” for raising concerns that Jackson herself later validated in writing. This retroactive admission proves Jackson was aware of her personal grievance while presiding and intentionally concealed it, denying Gerlach a fair tribunal. Her refusal to recuse herself under these conditions constitutes a grave breach of judicial ethics and a direct violation of Rule 2.3 and Rule 2.11(A). Jackson’s refusal to see this is wholly inappropriate demonstrates she is not competent.

Violations of Rule 2.6(A) – Ensuring the Right to Be Heard

Violation	Description
Summary denial of motions without hearing	Judge Charlene Jackson repeatedly issued one-word denials or summarily dismissed nearly every motion Gerlach filed, regardless of the seriousness of the issues raised. These motions detailed procedural violations, errors of law, and substantial evidence of fraud on the court—yet Jackson refused to engage with their substance or provide reasoned rulings. Notably, several of Gerlach’s motions included the same allegations that Jackson later reframed as “harassment” in her personal restraining order. While presiding over the case, Jackson never addressed these allegations in court, never acknowledged them in her rulings, and never disclosed any personal reaction. Her decision to summarily deny those motions—then later cite the same content as grounds for a retaliatory legal action—demonstrates clear bias and a failure to ensure Gerlach’s right to be heard.

	This pattern of dismissive rulings violated Rule 2.6(A), which requires judges to ensure that every party has a fair opportunity to present their case. Jackson’s conduct reflects a deliberate suppression of critical concerns and a breach of judicial responsibility, undermining both due process and the integrity of the proceedings.
Refusal to Consider Evidence of Abuse and Retaliatory Denial of Victimhood	Judge Charlene Jackson disregarded extensive documentation submitted by Erin Gerlach, including police reports, victim rights forms, and district attorney charging worksheet with photos, videos and other evidence attached from multiple agencies in California and Arizona. Jackson admitted in a minute order that she discarded Gerlach’s exhibits without review or admission into evidence. Despite this, she later accused Gerlach—under oath and in a sworn restraining order—of “pretending” to be a victim of domestic violence, while identifying herself as a sitting Superior Court Judge. This retaliatory and defamatory accusation had no legal relevance to Jackson’s personal filing and was made after she had recused from the custody case that is still active and reassigned to another judge. By publicly denying Gerlach’s victimhood without ever weighing the submitted evidence, Jackson not only undermined Gerlach’s credibility but also improperly influenced an active case. Her conduct reflects retaliatory intent, bias, judicial harassment, and a deliberate attempt to discredit a protective parent. It violates Rule 2.3(B) of the Arizona Code of Judicial Conduct, which prohibits harassment and prejudicial behavior, and constitutes a serious breach of judicial ethics.
Muting or Erasing Courtroom Audio	Jackson muted or erased parts of the official audio FTR system, preventing a complete and accurate record, which obstructed Gerlach’s ability to have a full hearing and subsequently undermined appellate review.
Ruling on key issues at hearings with improper notice	The UCCJEA Conference was scheduled with a few hours’ notice sent to parties via email, denying Gerlach time to prepare or respond.
Not allowing oral argument or party participation	During the UCCJEA conference, Jackson ordered parties not to speak and issued rulings without providing parties a meaningful opportunity to speak and present evidence, as required by law.
Procedural Manipulation	

	Jackson proceeded with hearings despite an invalid jurisdictional ruling, pending motions or appeals that should have stayed proceedings, ignoring Gerlach’s right to a fair process.
Improper UCCJEA Conference Without Participation	Jackson held a UCCJEA conference lasting less than 15 minutes, scheduled with only a few hours’ notice via email. She instructed parties to remain muted unless spoken to directly and denied both sides the opportunity to speak, present evidence, or submit materials. This violated Gerlach’s statutory and constitutional right to be heard. Jackson also removed the child from a protective order without allowing testimony, evidence or even reviewing the protective order or knowing why the child was protected to begin with. Gerlach and the child's rights to due process and equal protection were violated.
Failure to Hold Evidentiary Hearing Under A.R.S. § 25–1037(B)	Jackson failed to conduct the evidentiary hearing required by statute when determining jurisdiction. She made no findings on the record and issued a one-sentence ruling in a non-appealable minute entry. Gerlach was denied the opportunity to present facts or legal argument.
Issuing Orders Without Jurisdiction	After Gerlach filed a Notice of Appeal, Jackson proceeded with hearings and issued temporary orders—despite lacking jurisdiction and failing to comply with jurisdictional requisites to begin with. These orders were issued without proper evidentiary procedure and ignored Gerlach’s testimony about child abuse and domestic violence
Retaliatory Rulings Suppressing Input	Rulings were issued summarily against Gerlach, including penalties and denials, appearing to punish her for raising concerns or filing motions, which violates the fundamental right to be heard.
Failure to Schedule Evidentiary Hearing Under Rule 48(B)(3)	After Gerlach filed a Motion for Emergency Orders, Jackson was required under Arizona Rules of Family Law Procedure Rule 48(B)(3) to schedule an evidentiary hearing within 10 days. She failed to do so, instead scheduling a delayed status conference and issuing orders from that conference, which is prohibited under Arizona law.
Issuing Substantive Orders from Status Conference	

	Jackson appointed a Guardian ad Litem (GAL) from a status conference, violating procedural rules that prohibit judges from issuing substantive orders in non-evidentiary proceedings.
One-Word Denials of More Than a Dozen Motions	Gerlach filed over a dozen motions requesting relief citing safety concerns, statutory violations, misconduct, and due process concerns. Jackson denied each with one-word rulings, offering no explanation or engagement with the substance. This pattern reflects a refusal to hear or consider Gerlach’s legal arguments.
Conducting hearings without Gerlach’s effective participation	3 days after the issuance of Temporary Orders, Gerlach’s opposing party filed an emergency ex-parte Motion for Contempt, Enforcement, Sanctions, and a Warrant for the Child with permission to enter private property. In their filing, Gerlach’s opposing party and attorney openly admitted that Gerlach had not yet been served with the temporary orders yet. Despite this, they requested that Jackson hold her in contempt, impose sanctions, and issue a warrant to remove the child—while explicitly stating their malicious intent to “surprise” Gerlach. Jackson granted the request which was a blatant abuse of process without requiring procedural compliance or evidentiary support.
Unlawful Ex-Parte Warrant Without Notice or Hearing	Judge Charlene Jackson issued a warrant authorizing the physical seizure of Erin Gerlach’s child and entry onto private property less than three days after issuing temporary orders. This action was taken ex parte—without notice, without a hearing, and without affording Gerlach any meaningful opportunity to contest the request or participate in the proceedings. The warrant constituted a substantive ruling affecting both custody and property rights and should have required a full evidentiary hearing with all parties present. In their filing, Gerlach’s opposing party and attorney openly admitted that Gerlach had not yet been served with the temporary orders. Despite this, they requested that Jackson hold her in contempt, impose sanctions, and issue a warrant to remove the child—while explicitly stating their intent to “surprise” Gerlach. Jackson granted the request without requiring procedural compliance or evidentiary support. Her decision to authorize such an intrusive and consequential order under ex-parte conditions violated Gerlach’s constitutional right to due process and her procedural rights under Arizona Code of Judicial Conduct Rule 2.6(A). Jackson’s conduct reflects a deliberate disregard for fairness, a misuse of

	judicial discretion, and a failure to uphold the most basic protections owed to a litigant in a custody matter.
Refusal to Vacate Ex-Parte Orders Despite Procedural Violations	Jackson issued ex-parte orders, including a warrant to seize a child and enter private property, without sufficient evidence or procedural compliance. When Gerlach submitted documentation proving dishonesty and procedural defects Jackson refused to vacate the orders or hold a hearing.
Lack of reasoning or explanation in rulings	Jackson issued one-word denials for dozens of filings, providing Gerlach with a lack of reasoning or explanation. There are many other litigants and attorneys who have brought this concern to Jackson, in briefs and affidavits filed in her court.
Obstruction of appellate access	Jackson intentionally placed her unlawful jurisdictional ruling in a non-appealable format and continued issuing orders after Gerlach filed a Notice of Appeal, undermining her right to review.

Violations of Rule 2.9 – Ex parte Communications

Violation	Description
Private discussions with court security about Gerlach	Jackson admitted speaking with court security about Gerlach's case, leading to unlawful surveillance—all outside Gerlach's presence or knowledge. Gerlach's opposing party was made aware through ex-parte communication.
Retroactive use of alleged ex parte social media post	Judge Charlene Jackson claimed that Erin Gerlach's October 2024 social media post constituted ex parte communication. However, Jackson never disclosed this alleged violation during proceedings, never placed it on the record, and took no action while presiding over the case. Instead, she cited the post months later in a sworn personal restraining order—after recusing herself—using it to justify personal retaliation. Under oath, Jackson admitted she believed she had received ex parte communication but chose not to report it, address it in court, or notify the parties. If Jackson genuinely believed the

	post was improper, she had a mandatory duty to act at the time. Her failure to do so, followed by its weaponization in a personal filing, reflects retaliatory bias and a breach of judicial ethics under Rule 2.9(A) (ex parte communications) and Rule 2.6(A) (ensuring the right to be heard). If Jackson did not believe the post constituted ex parte communication, then her sworn statement in the restraining order was knowingly false—constituting perjury. She cannot have it both ways. Either she violated judicial ethics by concealing ex parte communication, or she committed perjury by fabricating it in a sworn filing. In either case, her conduct is indefensible and demands formal accountability.
No opportunity for Gerlach to respond to off-record communications	Jackson did not disclose or allow Gerlach to respond to court security or the Commission’s off-record exchanges regarding alleged threats of Gerlach going to the media about her case.
Collusion with law enforcement while Jackson continued presiding over the case	Jackson engaged in undisclosed communications with law enforcement agencies actively investigating Erin Gerlach, including officers affiliated with Gerlach’s opposing party. These communications occurred outside the presence of Gerlach or her counsel and were never disclosed on the record.
Participating in a criminal investigation targeting a litigant in her courtroom	Jackson admitted to being involved in a criminal investigation against Gerlach while continuing to preside over her custody case. This dual role—judge and investigator—violated the requirement that judges remain impartial and refrain from considering external information not presented in court.
Issuing rulings while relying on undisclosed external communications	Judge Charlene Jackson continued to issue substantive orders—including summary denials, custody rulings, warrants, and financial sanctions against a self-represented litigant—while actively coordinating with law enforcement, court security, and other judicial officers. Jackson admitted to receiving phone calls from fellow judges regarding a website that criticized her rulings and packages allegedly delivered to judicial officers’ homes. She also referenced communications from the Arizona Commission on Judicial Conduct and the Judicial Performance Review Board. None of these communications were disclosed on the record, shared with the parties, or subjected to evidentiary scrutiny. Jackson’s rulings were tainted by information obtained outside the judicial process, violating Rule 2.9(A) of the Arizona Code of Judicial Conduct, which prohibits judges from considering

	ex parte communications concerning a pending or impending matter. By allowing off-record commentary and external influence to shape her judicial decisions, Jackson denied Erin Gerlach her constitutional right to a fair and impartial hearing. Her conduct reflects a systemic breach of judicial ethics, a failure to preserve the integrity of the courtroom, and a deliberate circumvention of due process. These violations are compounded by Jackson’s refusal to recuse herself under Rule 2.11(A), despite clear evidence of bias, coordination, and personal involvement in retaliatory investigations.
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Violations of Rule 2.10(A) – Judicial Statements on Pending Cases

Violation	Description
Framing Protected Speech and Filings as Harassment	Jackson’s sworn statements also disparaged Gerlach’s protected complaints, public records requests, media statements, and public advocacy efforts, framing them as harassment and threats.
Publicly Discrediting Gerlach During Pending Proceedings	Jackson accused Gerlach of “pretending” to be a victim of domestic violence and labeled her a “liar” and “conspiracy theorist” for referencing court-filed motions and exposing judicial misconduct. These statements were made while Jackson identified herself as a sitting Superior Court Judge and were designed to undermine Gerlach’s credibility outside the courtroom. By publicly discussing facts, procedural posture, and allegations related to an active case, Jackson violated the rule prohibiting judges from making statements that could compromise impartiality or influence proceedings.
Improper Commentary on Active Family Court and Criminal Cases	Judge Jackson made sworn statements in a public restraining order filing that referred to Gerlach’s conduct and ongoing litigation, while Gerlach’s family court and related criminal cases are still pending. Jackson referenced Gerlach’s custody and criminal matters intending to influence future rulings.

	Jackson claimed Gerlach is “pretending” to be a victim of domestic violence and harassing judicial officers. These statements were made while identifying herself as a sitting Superior Court Judge. This constitutes prohibited extrajudicial commentary on pending or impending matters.
Sweeping Accusations Post-Recusal Intended to Influence Successor Judge	Jackson made broad public claims about Gerlach’s credibility, motives, and alleged misconduct in a sworn filing. These statements were clearly intended to influence the new judicial officer assigned to Gerlach’s case and undermine Gerlach’s standing in ongoing proceedings.
Commentary on Prosecutorial Status and Law Enforcement Coordination	Jackson referenced Gerlach’s criminal status and her own coordination with law enforcement in a sworn filing, while the criminal investigation was still pending. This commentary, made outside the courtroom, violated the prohibition on judicial statements that are affecting the fairness or outcome of an active case.
Improper Public Commentary on Judicial Colleagues, Oversight Bodies, and Security Agencies	In her sworn restraining order, Judge Charlene Jackson invoked the names and alleged experiences of other judicial officers—including former Presiding Judge Bruce Cohen—as well as the Arizona Commission on Judicial Conduct, court security personnel, and a local police department. These references were irrelevant to the legal basis of her filing and served only to selfishly bolster her personal narrative while lending credibility to her perjured claims. By publicly naming these individuals and agencies, Jackson improperly implicated them in a civil matter, effectively casting them as witnesses or implied victims in support of her retaliatory claims. Gerlach is entitled under the Constitution to face and challenge any party whose statements or alleged experiences are used against her in a judicial proceeding—including unnamed third-party judges, oversight bodies, and law enforcement agencies. If any of these officials had legitimate safety concerns, they were fully empowered to file their own protective orders or make independent statements. Jackson’s decision to name-drop respected colleagues and institutions in a sworn personal filing was a calculated attempt to lend credibility to her

	unsubstantiated claims while shielding herself behind institutional authority. Her actions represent a grave violation of judicial neutrality, decorum, and ethical restraint. By making public statements that could influence the fairness or outcome of ongoing proceedings, she has breached Rule 2.10(A) of the Arizona Code of Judicial Conduct. Furthermore, Jackson's exploitation of both the institutional credibility of the judiciary and the professional reputation of former Presiding Judge Bruce Cohen for personal advantage erodes public confidence in the judicial system. It compromises Gerlach's right to due process and entangles other judicial officers in her misconduct—effectively implicating them in her conspiracy and associating their names with acts of perjury, retaliation, and ethical violations. This conduct exposes those officers to reputational damage, public embarrassment, potential disciplinary action, and civil liability.
Alleged influence over prosecutorial decisions while case was pending	Jackson's coordination with law enforcement and commentary on Gerlach's criminal case during active proceedings violates this rule. She urged authorities to raise Gerlach's bond or detain her based on fabricated claims of harassment against a Superior Court Judge. Her civil restraining order was strategically timed and actively cited by prosecutors to justify recommending harsher conditions. This conduct weaponized judicial authority to criminalize dissent and silence oversight through retaliatory harassment and prejudicial influence.

Violations of Rule 2.11 – Disqualification

Presiding over case involving niece	Jackson failed to disclose or recuse from a case involving her own family member.
Participation in criminal investigation	Jackson met with investigators targeting Gerlach while still presiding over her case.
Coordination with opposing party	Jackson's involvement with Gerlach's ex and law enforcement created a clear conflict of interest.
Insertion into unrelated cases	Jackson commented on and disclosed information from Gerlach's criminal case, which she was not assigned to.

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Violations of Rule 2.11(A) – Disqualification for Bias or Conflict of Interest

Allegation	Description
Retaliatory restraining order	Jackson filed a personal restraining order against Gerlach on March 24, 2025—four months after recusing from the custody case—but cited alleged harassment spanning the exact period she presided. If Jackson genuinely believed Gerlach’s conduct was threatening, she had a legal and ethical duty to recuse immediately, not retroactively weaponize her grievance through a personal filing. Jackson admitted that Gerlach’s filings affected her personally yet continued issuing rulings for over a year before recusal.
Concealed grievance	Judge Charlene Jackson’s sworn restraining order, filed in March 2025, explicitly cited Erin Gerlach’s judicial complaints, oversight efforts, and public criticism as “harassment.” The incidents she described occurred between November 2023 and November 2024—while she was presiding over Gerlach’s custody case. This means Jackson perceived Gerlach’s lawful filings, complaints and public advocacy as personally threatening while she was still issuing rulings, including financial penalties, warrants, and summary denials. We know Jackson harbored this grievance during her judicial tenure because Gerlach raised these same allegations in multiple court briefs filed directly in Jackson’s courtroom. Jackson read them, ruled on them, and never disclosed any personal reaction or conflict. Her silence concealed a bias that she later admitted under oath—proving that her impartiality was compromised while she remained on the bench. This is not speculation; Jackson’s own restraining order confirms that she viewed Gerlach’s protected speech as hostile yet failed to recuse herself for over a year.
Retroactive justification	Judge Charlene Jackson cited Erin Gerlach’s oversight efforts and judicial complaints as “harassment” in a sworn restraining order filed in March 2025—four months after she was reassigned from Gerlach’s custody case. The allegations Jackson relied on

	spanned the exact period during which she presided over the matter, confirming that she perceived Gerlach’s lawful actions as hostile while still issuing rulings. Jackson was not blindsided by these concerns. She was fully aware of Gerlach’s criticism and complaints at the time they were filed, and Gerlach explicitly put Jackson on notice through multiple briefs submitted to her courtroom. Yet Jackson never disclosed any personal reaction, never recused herself, and continued to rule against Gerlach—including issuing financial penalties and summary denials. Her later decision to reframe those same filings as harassment in a personal legal action confirms that bias was operative throughout her judicial tenure. This is not merely the appearance of bias—it is actual bias, substantiated by Jackson’s own sworn statements. Her failure to recuse herself when confronted with direct criticism and allegations of misconduct violates Rule 2.11(A). Jackson’s retroactive justification exposes a concealed conflict of interest and undermines the integrity of every ruling she issued under its influence.
Surveillance coordination	While presiding over Erin Gerlach’s custody matter, Judge Charlene Jackson failed to disclose that she was actively collaborating with a law enforcement agency that employed Gerlach’s opposing party. This agency had no jurisdiction over Jackson’s residence, Gerlach’s residence, or the courthouse. In a ruling denying Gerlach’s motion for a change of judge in early to mid-2024, Judge Ronda Fisk explicitly stated that the agency was not responsible for judicial security and that the Maricopa County Sheriff’s Office (MCSO) held that role. Jackson was formally placed on notice that her association with this agency raised serious concerns about impartiality. Despite this warning, Jackson continued to engage with the agency throughout the case. She also admitted that court security began monitoring Gerlach’s online activity for “cyberstalking,” and evidence shows Jackson was working with court security since at least November 2023. This surveillance targeted Gerlach’s lawful dissent and advocacy and was conducted while Jackson was actively issuing rulings in the custody matter—including financial penalties, warrants, and summary denials—without ever disclosing her coordination with law enforcement or court personnel. Jackson revealed her involvement with the agency and surveillance efforts in March 2025, four months after the case

	was reassigned. Her concealment of these relationships while presiding over the matter constitutes a direct violation of this Rule
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Violations of Rule 2.15(B) – Responding to Judicial and Lawyer Misconduct – Reporting Lawyer Misconduct

Violation	Description
Failure to report opposing counsel's misconduct	Jackson was aware of repeated filings and affidavits submitted by Gerlach's ex or his attorney that contained false statements and procedural irregularities yet took no action to report or investigate.
Failure to report attorney coordination in surveillance	Jackson admitted that law enforcement and court personnel were monitoring Gerlach based on her complaints. If attorneys were involved in facilitating or legitimizing this surveillance, Jackson had a duty to report their conduct.
Failure to report misuse of legal process by attorneys	Jackson was aware that Gerlach was repeatedly served with the same restraining order and subjected to duplicative filings. If attorneys were responsible for these tactics, Jackson was obligated to report them.
Failure to report attorney involvement in retaliatory filings	Jackson's sworn affidavit and procedural history suggest that attorneys aligned with Gerlach's ex may have participated in or encouraged retaliatory filings. Jackson did not report this misconduct.
Failure to report attorney complicity in concealment of conflict	Jackson presided over a case involving her niece and concealed the relationship. If attorneys involved in the case were aware and failed to disclose it, Jackson had a duty to report their ethical breach.
Failure to report attorney participation in off-record coordination	

	If attorneys were involved in off-record discussions with Jackson or court security about Gerlach’s conduct, Jackson was required to report those communications as misconduct.
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Violations of Rule 2.16(B) – Cooperation with Disciplinary Authorities – Prohibition on Retaliation

Violation	Description
Filing retaliatory restraining order after complaints were filed	Jackson filed a personal restraining order against Gerlach shortly after Gerlach submitted judicial complaints and oversight referrals, citing those protected acts as “harassment.”
Retaliatory denials of filings post-complaint	Jackson issued one-word denials to Gerlach’s motions challenging fraud and misconduct after complaints were filed, without explanation or review.
Issuance of adverse orders timed to oversight activity	Jackson issued a warrant, financial sanctions, and punitive rulings shortly after Gerlach filed a notice of appeal and lawsuits against her.
Referencing protected oversight as misconduct in sworn filing	Jackson labeled Gerlach’s complaints to the Commission, recall petition, and federal outreach as “harassment” in a sworn affidavit, reframing lawful oversight as a threat.
Retaliatory framing of judicial complaints and advocacy	Jackson’s sworn filing cited Gerlach’s constitutionally protected speech and petitioning activity as justification for legal action, violating the rule’s prohibition on retaliation.
Continued adverse rulings while under investigation	Jackson continued issuing rulings against Gerlach even after being placed under investigation by the Commission, suggesting retaliatory intent.

Public accusation of misconduct for filing complaints	Jackson publicly accused Gerlach of wrongdoing for engaging in protected oversight activity, including public records requests and ethics complaints.
Weaponizing legal process to punish oversight	Jackson used her judicial status and court infrastructure to initiate surveillance and legal filings against Gerlach in response to her complaints.
Non-cooperation with disciplinary oversight	Jackson's retaliatory actions persisted despite Jackson knowing Gerlach filed complaints with the commission on Judicial Conduct. Jackson did not change her behavior, instead she escalated and retaliated suggesting active undermining and lack of respect for the disciplinary process.

Canon 3. A judge shall conduct the judge's extrajudicial activities so as to minimize the risk of conflict with the obligations of judicial office

Violations of Rule 3.10. Practice of Law

Violation	Description
Publicly identifying as legal counsel while serving as judge	In a December 2022 Phoenix New Times article, Jackson identified herself as both a Maricopa County Superior Court Judge and an attorney representing the Hualapai Tribe.
Serving as legal counsel for Hualapai Tribe while sitting as judge	Jackson's dual role as tribal attorney and sitting judge violates Rule 3.10's prohibition on practicing law while holding judicial office.

Violations of Law and Constitutional Protections

Arizona Statutory Violations

Violations of A.R.S. § 13–1202 – Threatening or Intimidating

Violation	Description
Retaliatory restraining order against litigant Erin Gerlach	Filed while presiding over Gerlach’s custody case, the order was intended to silence lawful criticism and deter future filings, imposing threat of arrest and legal penalties.
Repeated service of restraining order during court and incarceration	Served Gerlach seven times, including while she was in jail, creating fear and emotional distress, and interfering with her ability to participate in legal proceedings.
Threats of arrest or contempt for protected advocacy	Jackson made statements suggesting legal consequences if Gerlach continued filing complaints or speaking publicly, leveraging judicial authority to intimidate.
Ex parte surveillance and monitoring of Gerlach	Coordinated monitoring of Gerlach’s social media and communications outside of court, creating a chilling effect and atmosphere of fear.
Public statements in sworn filings mischaracterizing Gerlach	Affidavits and petitions labeled Gerlach’s lawful oversight as criminal or harassing, discouraging her participation in legal and legislative processes.
Coercive courtroom behavior	Jackson allegedly displayed intimidating conduct during hearings, including shouting, abrupt rulings, and punitive orders, intended to silence objections and compel compliance.
Issuance of civil restraining orders to silence whistleblowers	Jackson used judicial filings to target protective parents and complainants, attempting to block testimony and suppress reform efforts.

Use of judicial authority to intimidate through punitive rulings	Imposed unwarranted sanctions and threats of child removal to pressure litigants into silence or submission.
Creating hostile courtroom environments	Litigants were threatened with legal consequences for asserting their rights or raising legitimate concerns, impairing their ability to advocate safely.
Employing judicial status to deter complaints and appeals	Jackson's conduct and filings were designed to prevent parties and witnesses from pursuing oversight, appeals, or public accountability.

Violations of A.R.S. § 13–2702 – Perjury

For nearly two years, Erin Gerlach publicly and formally accused Judge Charlene Jackson of serious judicial misconduct. These weren't vague or speculative claims—they were specific, well-documented allegations submitted through court filings, formal complaints, a notice of claim, a recall petition, and multiple advocacy platforms. Gerlach believes Judge Jackson has committed far more acts of misconduct and criminal conduct than she's publicly alleged. But Gerlach has acted responsibly by only accusing Jackson of actions for which she holds direct, corroborated evidence. Gerlach accused Jackson of destroying evidence, intimidating witnesses, issuing fraudulent warrants, colluding with law enforcement, lying on her judicial application, and abusing her power in ways that endangered children and violated constitutional rights.

Jackson read these filings. She presided over the case. She never recused herself. She never filed a defamation claim. She never disputed the substance in real time.

Instead, months after stepping down from the case, Jackson filed a personal restraining order against Gerlach. In that sworn affidavit, Jackson listed Gerlach's allegations—then denied every one of them. She claimed Gerlach fabricated the accusations, labeled her a liar and a conspiracy theorist, and swore under penalty of perjury that she never said or did the things Gerlach accused her of.

In her March 2025 restraining order filing, Maricopa County Superior Court Judge Charlene D. Jackson listed a dramatic array of accusations she claims were made against her by litigant Erin Gerlach. Jackson's sworn statement includes the following:

“Defendant accused me of destruction of evidence, witness intimidation, extortion, perjury, violation of civil rights, conspiracy to commit child abuse and child endangerment, collusion with court-appointed providers, allowing litigants to submit fraudulent evidence, election fraud, election interference, colluding with the judicial nominating committee and judicial performance review, destruction of or concealing public records, filing false disclosures, lying on her application for appointment, providing false instruments for filing, numerous conspiracy charges, stealing someone's LinkedIn profile and impersonating them online, issuing warrants knowing the affidavits were falsified, and abusing her power over gut feelings and misconduct in office.”

Gerlach did make those accusations. She made them publicly, repeatedly, and formally. And she backed them with evidence—court transcripts, audio recordings, police reports, legal filings, and public records. Jackson’s sworn denial was a lie. A lie made under oath. A lie used to silence a protective mother exposing judicial misconduct while Jackson manipulatively reframed constitutionally protected speech as criminal harassment.

Under Arizona law, perjury occurs when a person knowingly makes a false sworn statement in a matter material to the issue at hand. Courts treat statements in petitions for protective orders as material because judges rely on those representations to determine whether an order is warranted.

Jackson’s sworn denials weren’t just retaliatory—they were materially false, strategically timed, and legally significant. They were designed to discredit a critic, suppress oversight, and shield a sitting judge from accountability. The following sworn statements by Judge Charlene Jackson are alleged to be knowingly false and materially relevant to active legal proceedings.

Violation	Description
Claiming she issued only one warrant in her Superior Court career	Jackson swore she had issued only one warrant as a Superior Court Judge. Public records show she issued multiple warrants—including more than one in Gerlach’s case. As a judge, she would have direct knowledge of her own warrant history, making this a knowingly false and material statement.
Falsely claiming she linked an anonymous article to Gerlach’s home address	Jackson claimed Gerlach authored a pseudonymous article and that it was registered to Gerlach’s home address via Medium.com—a platform that does not collect such data. No lawful basis was provided, raising concerns about fabricated evidence or unlawful surveillance. Either Jackson fabricated the claim about tracing an article back to the address and committed perjury or she abused her power and state resources to illegally obtained personal data over an article that is protected under the first amendment. Either is a crime.
Denied making “gut reaction” comments	In her sworn restraining order affidavit, Judge Charlene Jackson denied ever saying she denied a continuance because

	her “gut reaction” was that the attorney’s illness was a tactic. But the official record says otherwise. A signed and court-accepted Motion for Change of Judge, filed by a respected attorney, quotes Jackson directly: she cited her “gut reaction” as the reason for denying a continuance. The motion also documents Jackson’s refusal to acknowledge the attorney’s documented illness, dismissing it as “fortuitous.” The motion was granted—confirming the court accepted the allegations as credible. Jackson never objected to the filing. Instead, she waited until over a year later—after Gerlach publicly exposed the incident—to deny it ever happened in her sworn restraining order filing. Her denial wasn’t just false. It was retaliatory. Jackson used her restraining order to discredit Gerlach, calling her a liar and conspiracy theorist for citing a public record that Jackson herself had never challenged. If Jackson truly believed the quote was fabricated, she had a legal and ethical obligation to report the attorney to the State Bar of Arizona for misconduct. She did not. That silence confirms Jackson knew the quote was accurate and chose instead to retaliate against Gerlach for exposing it. Gerlach had every reason to believe the record was true—because the court accepted it and granted the motion. Jackson’s attempt to erase this documented instance of judicial bias and unprofessional conduct is a clear abuse of power. If she knowingly denied a statement that appears in a signed, court-accepted motion, her sworn denial constitutes perjury under A.R.S. § 13–2702. And her effort to punish Gerlach for exposing it publicly violates First Amendment protections and judicial ethics. This wasn’t a misunderstanding. It was a calculated attempt to rewrite the record, silence oversight, and retaliate against a litigant who dared to speak the truth.
Accused Gerlach of pretending to be a domestic violence victim	In her sworn restraining order affidavit, Judge Charlene Jackson accused Erin Gerlach of fabricating her status as a domestic violence victim, claiming Gerlach was “pretending” to be a victim of domestic violence. This accusation was defamatory, retaliatory, and demonstrably false. Jackson admitted in a minute order that she disposed of Gerlach’s exhibits without reviewing or admitting them into evidence—meaning she never legally evaluated the evidence Gerlach submitted. Despite this, Jackson made a sweeping sworn claim that Gerlach’s victimhood was fake, while identifying herself as the judge who presided over Gerlach’s custody case for two years. The evidence Gerlach submitted included police reports from multiple agencies in Arizona and California with

	supporting videos and photos, victim rights forms listing Gerlach as a victim of assault and disorderly conduct and her daughter as a victim of child abuse and disorderly conduct, and a charging worksheet for domestic battery from the Los Angeles DA confirming that charges weren't filed only due to the 1 year statute of limitations. These are official government records. By denying Gerlach's victim status under oath, Jackson implied that multiple law enforcement agencies and prosecutors across two states were lying—an extraordinary and baseless claim. Her sworn statement wasn't based on evidence; it was based on bias. She ignored the documentation, refused to conduct a proper evidentiary review, and used her judicial title to publicly discredit a litigant who had exposed her misconduct. Her accusation was made under oath, used to justify a personal restraining order, and contradicted by the public record. It inflicted reputational harm and undermined Gerlach's credibility in both family and criminal court. It meets the criteria for defamation: a knowingly false statement made without basis, causing reputational damage. And under A.R.S. § 13-2702, perjury—because Jackson made a material, sworn claim she knew or should have known was false. Jackson also violated judicial ethics by publicly commenting on an active case in which she had presided for two years. Her sworn statements about Gerlach's credibility and victim status were made while the custody case was still active and while Gerlach's criminal case was pending—violating the Arizona Code of Judicial Conduct Rule 2.10(A), which prohibits judges from making public statements that could affect the outcome or fairness of a proceeding. And critically, Gerlach's status as a domestic violence victim had no legal bearing on Jackson's ability to file a restraining order. Jackson's decision to include that accusation was gratuitous, inflammatory, and intended to discredit Gerlach—not to establish any relevant legal basis. It was a personal attack disguised as a legal claim, made under oath, and used to retaliate against a mother who dared to expose her misconduct.
Claimed Gerlach sent anonymous packages to judges' homes	Jackson accused Gerlach of sending anonymous packages to other judges' homes. She admitted she wasn't a recipient and provided no evidence. She also participated in a criminal investigation led by the opposing party's employer while still presiding over Gerlach's case—without disclosing the conflict. Jackson accused Gerlach of sending anonymous packages to

	other judges' homes. She admitted she wasn't a recipient and provided no evidence. She also participated in a criminal investigation led by the opposing party's employer while still presiding over Gerlach's case—without disclosing the conflict. Her sworn claim was speculative, inflammatory, and designed to paint Gerlach as a security threat without any factual basis. And also interfered with any potential law enforcement investigation and destroyed any case they would have against the real perpetrator if this is even considered a crime but more than likely it was not a criminal act and the judicial officers went to their preferential police department—one that does not have jurisdiction over the courthouse so they could illegally obtain identifying information on their critics, wasting taxpayer dollars and state resources
Denied misconduct in office	Jackson denied abusing her position. But her conduct—retaliatory filings, false sworn statements, misuse of public resources, and suppression of evidence—meets Arizona's legal definition of misconduct in office. Her denial contradicts her own record. Jackson denied abusing her position. But her conduct—retaliatory filings, false sworn statements, misuse of public resources, and suppression of evidence—meets Arizona's legal definition of misconduct in office. Her denial contradicts her own record and reflects a calculated effort to evade accountability while continuing to retaliate against a litigant who exposed her.
Denied intimidating a witness (Gerlach)	Judge Charlene Jackson denied intimidating Erin Gerlach, a key witness to her misconduct. But her actions tell a different story—one of calculated retaliation and abuse of judicial authority. Jackson filed a personal restraining order against Gerlach that sought to intimidate Gerlach into silence and discredit her lawful oversight. She timed the filing to coincide with Gerlach's arrest for custodial interference, served her during incarceration, and used the restraining order to influence bond recommendations—directly interfering with Gerlach's criminal case. Jackson also placed Gerlach's child with her known abuser, issued retaliatory warrants and sanctions, and created a climate of fear for a mother who had repeatedly warned of danger. She coordinated with law enforcement tied to Gerlach's opposing party and weaponized judicial infrastructure to punish a protective mother. Jackson admitted to monitoring Gerlach through court security and law enforcement—based on constitutionally

	protected complaints and advocacy. She publicly framed Gerlach’s filings and speech as “harassment,” accused her of fabricating victimhood, and disposed of Gerlach’s evidence without review, undermining her credibility and silencing her voice. These actions weren’t isolated—they were coordinated. Jackson’s rulings, surveillance, and public accusations created a hostile environment designed to intimidate Gerlach into silence. Her conduct obstructed lawful participation, chilled protected speech, and interfered with Gerlach’s ability to testify freely about judicial misconduct. Jackson’s retaliatory actions, reckless disregard for the law, and failure to follow basic legal procedures also hindered Gerlach from participating in her own custody case as a witness. Gerlach was too fearful and intimidated to speak openly in court, knowing Jackson had weaponized her authority to retaliate and punish. This is witness intimidation. It violates Gerlach’s constitutional rights, undermines the integrity of the legal process, and exposes Jackson and the agencies that enabled her to civil liability under 42 U.S.C. § 1983 and § 1985. Jackson used the power of the bench to threaten, isolate, and suppress a witness demanding accountability.
Denied violating civil rights	Jackson denied violating Gerlach’s and her child’s rights, but her record shows systemic abuse. She issued an ex parte warrant for a child with permission to enter private property while the opposing party admitted intent to “surprise” Gerlach and asked for contempt sanctions on orders they acknowledged she hadn’t been served with—violating fair notice and due process. Jackson held a rushed UCCJEA conference with no hearing or evidence, removed the child from a valid protective order, and issued custody rulings without jurisdiction or statutory findings. She placed orders in non-appealable formats, blocking appellate review. Despite evidence of domestic violence and child abuse, Jackson gave full legal decision-making to the abuser, endangering the child and violating VAWA protections. She retaliated against Gerlach’s oversight by filing a personal restraining order, mislabeling protected speech as “harassment,” and admitted coordinating surveillance with court security and law enforcement. Gerlach’s motions were denied without review while Jackson favored attorneys accused of fraud. These acts violated the First, Fourth, and Fourteenth Amendments, victims’ rights statutes, and ethical

	standards requiring impartiality and recusal. Jackson’s sworn denial attempts to erase a record of constitutional harm inflicted on a vulnerable family.
Denied collusion with court-appointed providers	Judge Charlene Jackson denied colluding with biased court-appointed providers. But multiple cases show she repeatedly retained professionals with clear conflicts of interest—individuals tied to opposing parties, prior complaints, or patterns of misconduct. A sitting legislator confirmed that constituents reported Jackson’s coordination with these providers to suppress oversight and silence protective parents. Her denial conceals a broader pattern of judicial favoritism and manipulation of case outcomes through compromised professionals. After public exposure of her potential collusion, many of Jackson’s case records began omitting providers from the party listings—despite those same providers being formally appointed in the case files. This shift wasn’t accidental. Jackson knew her records were being searched and deliberately obscured her appointments to avoid scrutiny. The concealment itself is evidence of intent. Jackson didn’t just misuse biased professionals—she tried to erase the paper trail. That’s strategic cover-up.
Denied collusion with judicial oversight bodies	Jackson denied colluding with oversight agencies, but her own sworn affidavit proves otherwise. She quoted verbatim from citizen emails allegedly sent to the Judicial Performance Review Board (JPR), including one attributed to Gerlach—reframing a lawful records request as “harassment.” She clearly had access to internal JPR communications and used them in a personal legal filing. Jackson also admitted that the Arizona Commission on Judicial Conduct alerted court security after Gerlach filed complaints against Jackson and threatened to contact the media about her custody case—a constitutionally protected act. Security then began monitoring Gerlach while Jackson continued presiding over her case for over a year. She withheld disclosure of these alleged threats for over 16 months, only revealing them in a retaliatory restraining order. Her sworn denial collapses under the weight of her own admissions. This isn’t just retaliatory—it’s perjury. Jackson denied collusion while presenting evidence of it, weaponizing her judicial title to silence a critic and mischaracterize protected speech as criminal behavior.

Denied lying on her judicial application	Judge Charlene Jackson denied misrepresenting her qualifications in her sworn restraining order affidavit. But her judicial application and official biography—submitted to the Arizona Governor’s Office and Judicial Nominating Committee—omit multiple legal and judicial roles that she has publicly claimed elsewhere. These omissions are not minor—they conceal substantial experience that would have triggered scrutiny, raised questions about conflicts of interest, and demanded disclosure. Specifically, Jackson failed to disclose: Serving as an Appellate Judge for the Hualapai Tribe and the Washoe Tribe of California and Nevada Working as an attorney for the Hualapai Tribe Notably, she did list attorney roles with other tribes, making the selective omission of her Hualapai affiliation especially suspicious. These omissions misled the Governor’s Office and Judicial Nominating Committee, both of which relied on her application to assess her fitness for judicial service. Her denial was used to discredit Gerlach’s lawful oversight and conceal a pattern of selective disclosure designed to manipulate her public image. Jackson also pretends like Gerlach finding this evidence and other evidence of her misconduct is “cyberstalking” when judges or any public figure isn’t afforded the same reasonable privacy and evidence obtained proving Jackson’s misconduct and potential criminal conduct has been legally obtained through channels such as public records. Because judicial applications are submitted under penalty of perjury, knowingly omitting material roles constitutes a criminal violation under A.R.S. § 13–2702. Jackson’s sworn denial wasn’t just false—it was strategic. It was used to discredit Gerlach’s lawful oversight and conceal a pattern of selective disclosure intended to obscure prior misconduct or conflicts of interest. So far, we know Jackson lied about these roles. But given her pattern of omission and retaliation, it’s entirely possible she lied about more. Gerlach’s accusation was not defamatory—it was factually grounded, supported by Jackson’s own public admissions, and corroborated by documented contradictions across multiple sources.
Denied Submitting false instruments for filing	Judge Charlene Jackson knowingly submitted documents containing material misrepresentations to both public entities and the court—constituting the submission of false instruments under A.R.S. § 39–161. The first false

	instrument was her judicial application, submitted to the Arizona Governor’s Office and Judicial Nominating Committee. This application was used to evaluate her qualifications for appointment to the Maricopa County Superior Court. Yet Jackson’s application and official biography omitted multiple legal and judicial roles she has publicly claimed elsewhere, see violation above. The second false instrument was her March 2025 restraining order affidavit against Erin Gerlach. In that sworn filing, Jackson made multiple material misrepresentations, including but not limited to: Falsely claiming Gerlach fabricated her accusations and never submitted formal complaints Misrepresenting Gerlach’s protected speech and legal filings as “harassment” Denying her own judicial actions—such as issuing warrants, presiding over her niece’s case, and making “gut reaction” rulings—despite public records proving otherwise Jackson knew these statements were false. She had presided over Gerlach’s case, read her filings, and responded to her motions. Her restraining order was not a protective measure—it was a retaliatory legal weapon used to silence a whistleblower and discredit a litigant engaged in legally exposing judicial misconduct. By filing this sworn affidavit with the court, Jackson knowingly submitted a false instrument that misrepresented facts, distorted the judicial record, and abused the credibility of her office. It is a deliberate act of deception, used to obtain legal relief under false pretenses and retaliate against a critic. Taken together, Jackson’s judicial application and restraining order affidavit reflect a sustained pattern of dishonesty, retaliation, and abuse of process. They were submitted to public institutions and the court system with the intent to mislead, obstruct accountability, and preserve power. Under Arizona law, this constitutes a criminal violation—and it demands investigation.
Denied participating in conspiracy	Jackson denied conspiring against Gerlach, but her own sworn affidavit and conduct prove otherwise. She coordinated with a police department that employed Gerlach’s opposing party—the father of her child—and admitted participating in a criminal investigation into Gerlach’s conduct while still presiding over her custody case. That department had no jurisdiction over Jackson, Gerlach, or the courthouse. Jackson met with investigators, failed to disclose her involvement,

	and continued ruling without recusal. She continued her secret coordination even after being served with a Notice of Claim alleging conspiracy. She participated in a jurisdictionally improper investigation and filed a retaliatory restraining order after being served with a Notice of Claim alleging conspiracy. She knowingly allowed fraudulent filings and false statements from the opposing party and his attorney to influence custody rulings, refused to vacate orders even when presented with proof of perjury, and remained on the case despite admitting personal bias. Jackson imposed retaliatory sanctions and attorney's fees, coordinated with oversight bodies that ignored misconduct, and used her judicial office to punish Gerlach for protected speech. These acts formed part of a broader civil rights conspiracy, aimed at depriving Gerlach and her child of due process, equal protection, and familial association rights. Her sworn denial contradicts her own rulings, admissions, and the public record. It wasn't just false—it was part of the conspiracy itself.
Denied presiding over her niece's case	Jackson denied ever presiding over a case involving her niece, Paige Jackson. But the official Maricopa County docket listed Judge Charlene Jackson as the assigned judicial officer. The case was reassigned on the same day Gerlach's case was reassigned—just hours after Gerlach submitted misconduct evidence to the Arizona Supreme Court. Jackson's denial concealed a serious conflict of interest and contradicted the public record. If she knowingly lied, it constitutes perjury. If she was unaware, it raises serious concerns about her competence and oversight of her own division. Regardless, if the official court website showed Jackson assigned to her niece's case, Gerlach is not a "liar" for exposing that information. Citizens should expect the court's own records to be accurate, and it would be an extraordinary coincidence if the case was mistakenly assigned to Jackson's docket. Speaking about this is protected under the First Amendment. Gerlach disclosed the conflict multiple times in Jackson's courtroom, to the Presiding Judge, and to the Commission on Judicial Conduct. After every agency refused to act, she disclosed the conflict publicly. Jackson remained silent in response to Gerlach's filings and complaints. She did not disclose the familial connection, recuse herself, or correct the record. Jackson denied the connection only in her restraining order against Gerlach.

	That sequence proves Jackson was aware of the allegation, chose not to address it while acting as a judge, and only responded when she was no longer bound by judicial oversight. Her denial wasn't just false—it was retaliatory. It was used to discredit a whistleblower, suppress public accountability, and conceal a conflict that directly undermined the fairness of her rulings. The reassignment timing alone suggests the court recognized the conflict but failed to acknowledge it publicly. Jackson's later denial was not a defense—it was part of the cover-up.
Retaliatory framing of protected speech as "harassment"	Jackson's harassment claims included constitutionally protected acts: filing complaints with oversight bodies, submitting a recall petition, requesting public records, and speaking publicly about judicial misconduct. These actions are protected under the First Amendment, yet Jackson retroactively labeled them as threats to her safety—using her judicial title to legitimize false claims and silence dissent. Her sworn filings even cited Gerlach's "threat" to contact the media about her custody case, which Jackson used to justify surveillance by court security and law enforcement. By misusing her authority to criminalize lawful oversight, Jackson sent a chilling message to whistleblowers and protective parents: speak out, and you'll be punished. Her coordination with court security and law enforcement to monitor Gerlach's speech wasn't just inappropriate—it was state-sponsored retaliation that weaponized public resources against constitutionally protected dissent. These actions not only violated judicial ethics and constitutional rights—they opened Jackson, and the agencies that enabled her, to civil liability under federal law. When a judge conspires with state actors to suppress protected speech and retaliate against oversight, it implicates 42 U.S.C. § 1983 and § 1985, exposing the state to legal consequences for deprivation of rights under color of law. On March 24, 2025, Judge Charlene Jackson filed a personal restraining order against Erin Gerlach, accusing her of harassment based on eight alleged incidents—all of which occurred while Jackson was actively presiding over Gerlach's custody case. The final alleged incident took place four months earlier, yet Jackson waited until Gerlach's arrest for custodial interference to file the order—timed to inflict maximum reputational damage and influence Gerlach's criminal proceedings. Jackson knows her own misconduct is going to surface at trial and is using the restraining order to preemptively discredit Gerlach and shift the narrative.

	Jackson’s intent wasn’t just to mischaracterize Gerlach’s speech—it was to intimidate her into silence. She knowingly made false claims to obtain a restraining order, materially restricting Gerlach’s rights and speech. Jackson used the power of the bench to criminalize dissent, suppress accountability, and punish a whistleblower who had exposed her misconduct. It was a deliberate abuse of judicial authority designed to isolate, discredit, and silence a protective mother demanding justice.
Denied control over courtroom audio system (FTR)	Judge Charlene Jackson denied muting courtroom recordings, stating under oath that she had no control over the FTR (For The Record) audio system in her courtroom. But this is a blatant and provable lie. Every judge in the Maricopa County Superior Court knows that is a lie. Jackson’s denial contradicts her role and responsibilities and was made to deflect accountability for missing or altered recordings. Multiple unrelated cases document trimmed, muted, or missing audio in Jackson’s courtroom, including segments where misconduct was allegedly discussed. Despite repeated complaints, Jackson never investigated, reported, or sought technical support for the issue. Her sworn denial wasn’t just false—it was a calculated attempt to conceal tampering and suppress oversight. Her retaliatory restraining order against Gerlach for publicly exposing these issues further confirms a deliberate effort to obstruct accountability and silence criticism.

Violations of A.R.S. § 13–2407 – Tampering with Public Records

Violation	Description
Muting or Manipulating Court Audio Recordings	Jackson intentionally muted segments of the For The Record (FTR) system to conceal remarks reflecting bias, undisclosed motives, or procedural violations. Multiple litigants and attorneys report audio recordings of hearings disappeared, were incomplete, or were intentionally not preserved, impairing appellate review and transparency.

	Courtroom recordings are public records. Knowingly muting or suppressing audio—especially to conceal bias, misconduct, or procedural violations—may constitute “destroying, mutilating, concealing, removing or otherwise impairing” the availability of a public record under § 13-2407
Placing Jurisdictional Rulings in Non-Appealable Minute Entries	Minute entries are public records. Misclassifying or misfiling rulings to block appellate review may constitute a “false entry” or intentional impairment of a record’s availability. If done knowingly to obstruct oversight, it fits the statute.
Filing False or Misleading Court Orders and Minute Entries	Jackson entered rulings in formats designed to be non-appealable, including jurisdictional decisions, to avoid scrutiny. She admitted to placing rulings in minute entries exempt from appellate review, concealing violations of due process and statutory law.
Omitting Required Disclosures on Judicial Forms	Judicial disclosure forms are public records. Jackson omitted prior roles as judge and attorney for multiple tribal governments in her Application for Judicial Appointment. Knowingly leaving out material affiliations or legal positions—especially those relevant to recusal or bias may constitute a “false entry.” If these omissions were intentional and designed to mislead judicial selection committees or conceal conflicts, they carry criminal implications under § 13-2407.
Altered, falsified, and back dated minute entries	Multiple litigants report that Jackson retroactively modified minute entries without notifying parties or documenting the changes. These alterations were allegedly made to justify later rulings, conceal procedural violations, or obscure her failure to follow Arizona law. If done knowingly and without lawful authority, this conduct may constitute a “false entry” or intentional impairment of a public record under § 13-2407.
Defamatory Accusations, Intentional Misrepresentations, and Perjury in Sworn Filings	Jackson’s sworn filings contain defamatory accusations and intentional misrepresentations—falsely portraying Gerlach’s protected advocacy as criminal threats. These statements contradict public records, law enforcement documentation, and constitutional protections. Her actions constitute perjury and tampering with public

	records by corrupting the integrity of official documents, obstructing justice, and inflicting reputational harm through falsified judicial filings.
Retaliatory Restraining Order Filings	Jackson made knowingly false and materially misleading statements in her sworn restraining order affidavit—accusing Gerlach of “harassment” and “threats” contradicted by public records and protected First Amendment activity. She omitted key facts, misrepresented lawful oversight, and used her judicial title to legitimize false claims. These filings became official court records and were used to justify surveillance, retaliation, and legal oppression. This conduct constitutes tampering with public records by corrupting the judicial record with intentional deception, obstructing justice, and violating procedural fairness.

Violations of A.R.S. § 13–2409 – Obstructing Criminal Investigations or Proceedings

Violation	Description
Ignoring Evidence of Abuse and Criminal Conduct	Jackson repeatedly dismissed documented reports of domestic violence, stalking, and child abuse submitted by Gerlach from law enforcement and prosecutors. Her refusal to act on credible evidence obstructed ongoing or potential investigations into the opposing party’s conduct.
Issuing false or misleading judicial orders and statements	Jackson submitted sworn filings that misrepresented facts about warrants, family conflicts, and Gerlach’s conduct, delaying or obstructing investigations.
Retaliation That Impedes Justice	Jackson retaliated against Erin Gerlach—a victim and key witness—through personal legal actions and biased rulings. This intimidation obstructed Gerlach’s ability to cooperate with law enforcement and participate in criminal proceedings, impeding justice and silencing a witness.

Coordinating surveillance outside lawful procedures	Jackson orchestrated unauthorized monitoring of Gerlach's speech and conduct, disrupting the flow of information to criminal authorities.
Failure to disclose evidence or court records	Jackson withheld or manipulated audio/video records and court documents relevant to investigations into judicial misconduct.
Intimidating a party involved in legal proceedings	Jackson served Gerlach seven times—including while she was in jail—interfering with her ability to participate in her defense and access legal resources.

Violations of A.R.S. § 13–2703 – False Swearing

Violation	Description
False Statements Under Oath in Restraining Order Filing	Jackson stated under oath that she had only issued one warrant in her judicial career, while court records show multiple warrants, including in Gerlach's case.
Mischaracterizing a Social Media Post as Ex Parte Communication	In May of 2025, Jackson swore that an October 2024 social media post constituted an ex parte communication. If she treated it as ordinary at the time and only later weaponized it under oath, this may constitute a false sworn statement.
Omissions or Misstatements on Judicial Disclosure Forms	Jackson omitted prior legal roles, including tribal attorney work, on her judicial application. These forms are signed under penalty of perjury. Knowingly omitting required disclosures constitutes false swearing.

Violations of A.R.S. § 13–2810 – Interference with Judicial Proceedings

Violation	Description
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Altering or Muting Courtroom Audio Recordings	Multiple litigants and attorneys have alleged that key segments of hearings are routinely missing—especially when Jackson makes prejudicial or questionable statements. In Gerlach’s case, the beginning of a critical hearing was missing from the FTR audio, coinciding with Jackson’s verbal admission that she intentionally placed the jurisdictional ruling in a non-appealable format. The pattern of missing or altered audio undermines transparency, violates litigants' constitutional rights, and obstructs judicial review.
Retaliatory judicial orders and warrants	Jackson issued a warrant and sanctions against Gerlach shortly after she filed complaints and appeals, suggesting retaliatory misuse of judicial authority. Jackson mentioning Gerlach’s complaints in her restraining order 4 months after recusal demonstrates she harbored ill feelings and animosity towards Gerlach for filings the complaints.
Collusion with court security and law enforcement	Jackson admitted in her restraining order that she coordinated with court security and law enforcement to monitor Erin Gerlach’s protected speech, and advocacy efforts—without lawful basis. According to the complaint, Jackson engaged in behind-the-scenes surveillance of Gerlach’s public records requests, social media posts, and communications with oversight bodies, including the Arizona Commission on Judicial Conduct. This surveillance was not part of any formal investigation or authorized proceeding. It was covert, retaliatory, and designed to intimidate a litigant who had lawfully exposed judicial misconduct. Jackson’s coordination with law enforcement—while still presiding over Gerlach’s case—violated the appearance of neutrality and weaponized public resources to suppress dissent. By monitoring Gerlach’s constitutionally protected speech and legal filings, Jackson interfered with her privacy, chilled her advocacy, and obstructed her access to fair process. These actions meet the threshold for unlawful interference under A.R.S. § 13–2810 and raise serious concerns about abuse of power, collusion, and retaliatory surveillance conducted under color of judicial authority.
Issuing Non-Appealable Rulings to Block Oversight	Jackson conducted a sham UCCJEA conference with only a few hours’ notice, denied both parties the opportunity to speak or present evidence, and removed a child from a valid out-of-state

	restraining order without reviewing it. She failed to make the eight statutory findings required under A.R.S. § 25–1037(B), then issued a one-sentence jurisdictional ruling in a minute entry deliberately formatted to be non-appealable. At the next hearing, she admitted she didn’t care about the Notice of Appeal Gerlach filed because she INTENTIONALLY placed the ruling on jurisdiction in a non-appealable minute entry. That segment of the FTR audio is missing, and court security could not produce footage from the day. Jackson proceeded to issue retaliatory orders while lacking jurisdiction, suppressing domestic violence evidence and violating due process.
Proceeding With Hearings After Notice of Appeal Was Filed	Judge Charlene Jackson continued issuing rulings—including custody orders and warrants—after a valid Notice of Appeal had been filed and served. At the start of the temporary orders hearing, Jackson acknowledged that she could not proceed if a Notice of Appeal had been filed. Moments later, she made inappropriate comments about having placed her jurisdictional ruling—the very subject of Gerlach’s appeal—in a non-appealable minute entry, stating she would proceed with the hearing anyway. On the FTR record, Jackson claimed she could not locate the Notice of Appeal, despite Gerlach’s opposing counsel holding a paper copy and Jackson having been served via the same email thread. When issuing the temporary orders, Jackson changed her story again, stating she had received the Notice of Appeal but that it lacked “indicia of filing”—essentially claiming it wasn’t stamped. She had not made that claim during the hearing itself, likely because Gerlach would have immediately provided proof. Jackson’s shifting narrative, disregard for appellate jurisdiction, and retaliatory rulings issued while divested of authority constitute direct interference with judicial proceedings under A.R.S. § 13–2810. This also interferes with the Appellate process.
Enforcing Orders Without Proper Service or Legal Basis	Jackson allowed enforcement actions and warrants to proceed without proper service, hearings, or judicial findings—violating due process and interfering with lawful proceedings. One of the most egregious examples involved Jackson issuing a warrant to seize a child and enter private property based on an affidavit riddled with falsehoods, contradictions, and procedural defects. The affidavit directly contradicted sworn declarations made by the same affiant in another court and failed to meet the legal standard for contempt or emergency relief. Gerlach had never been served with the original order, a fact openly admitted by the opposing party and his attorney in their request for the warrant. They stated their intent was to “surprise”

	Gerlach—revealing a malicious strategy that Jackson knowingly endorsed. Gerlach submitted at least six motions, alerting Jackson to the fraudulent nature of the affidavit and the procedural violations embedded in the request. Despite being presented with substantial evidence of perjury, deception, and abuse of process, Jackson issued summary denials without explanation, findings, or acknowledgment of the record. She refused to quash the warrant or address the falsified affidavit, allowing a fraudulent order to remain in effect and placing Gerlach and her child in danger. This conduct violates Rule 2.5(A) of the Arizona Code of Judicial Conduct, which requires competence and diligence, and Rule 2.6(A), which guarantees every litigant the right to be heard. Jackson’s refusal to engage with the evidence, her approval of relief based on knowingly false claims, and her failure to uphold procedural safeguards reflect actual bias, misconduct in office, and judicial complicity in fraud upon the court. By issuing and enforcing judicial orders without legal foundation, procedural compliance, or impartial review, Jackson weaponized her authority to retaliate against a protective mother, suppress oversight, and obstruct justice. These actions meet the threshold for unlawful interference under A.R.S. § 13–2810 and expose a coordinated conspiracy between the bench and Gerlach’s opposing party.
Participation in criminal investigation while presiding	Judge Charlene Jackson actively engaged with law enforcement about Erin Gerlach’s conduct while still presiding over her custody case. According to the complaint, Jackson met with officers connected to the opposing party’s employer and discussed Gerlach’s alleged “harassment”—claims Jackson never raised in court or entered into the record. These meetings occurred while Jackson continued issuing rulings in Gerlach’s case, including custody orders, warrants, 1-word denials, and sanctions. In her March 2025 restraining order application, Jackson explicitly claimed to be a victim of Gerlach’s alleged harassment. This admission confirms that Jackson believed herself to be personally targeted while she was still ruling on Gerlach’s case—meaning she harbored undisclosed bias for at least a year. Her failure to recuse or disclose this conflict violated judicial ethics and obstructed Gerlach’s right to a fair and impartial tribunal.

	Jackson’s allegations were later used to influence prosecutorial decisions in Gerlach’s criminal case, including efforts to escalate detention and argue for stricter bond conditions. Her dual role—acting as both judicial officer and complainant—compromised the integrity of both proceedings. These actions meet the threshold for unlawful interference under A.R.S. § 13–2810 and raise serious concerns about abuse of power, collusion with law enforcement, and retaliation against a whistleblower.
Escalation of detention efforts during pending case	Judge Charlene Jackson’s actions influenced Gerlach’s treatment in jail. At Gerlach’s initial appearance, the prosecutor cited Jackson’s restraining order allegations—based on demonstrably false claims—as justification for arguing stricter bond conditions. Jackson’s behind-the-scenes coordination with law enforcement and prosecutorial staff appears designed to criminalize dissent and punish Gerlach for exposing judicial misconduct. These retaliatory moves obstruct justice, distort prosecutorial discretion, and inflict harm outside lawful adjudication. They also risk compromising the prosecutor’s reputation and ethical standing by pressuring them to rely on perjured material of a sitting Maricopa County Superior Court Judge. Jackson weaponized her judicial status to influence Gerlach’s treatment while incarcerated, influence judicial officers and interfere with proceedings in Gerlach’s custodial interference case.
Repeated service of restraining order to disrupt process	Judge Jackson coordinated with the opposing party in Gerlach’s custody case to repeatedly serve her with the same restraining order—seven times total, including twice in court dates a month apart and multiple times while Gerlach was in jail. These actions were not procedural necessities, but strategic acts of intimidation designed to scare Gerlach into silence, reinforce a false narrative of threat, cause emotional distress, and influence other judicial officers presiding over Gerlach’s active cases. The timing and repetition disrupted Gerlach’s ability to participate meaningfully and influenced her treatment while incarcerated. This constitutes abuse of process and unlawful interference with judicial proceedings.
Continued rulings while harboring undisclosed bias	Judge Charlene Jackson presided over Erin Gerlach’s case for over a year while harboring personal grievances, meeting with law enforcement tied to the opposing party’s employer and coordinating surveillance—without disclosing any alleged threats or recusing herself. She withheld disclosure for over 16 months and only revealed her allegations in a retaliatory restraining order filed four months after recusal. Jackson

	retroactively cried “harassment” about incidents she never raised in court or entered into the record. Her civil filing is now influencing Gerlach’s criminal case: at her initial appearance, prosecutors cited Jackson’s false allegations to argue for stricter bond conditions. By placing perjured claims into the judicial record, Jackson has not only obstructed justice—she has recklessly exposed prosecutors to reputational harm and ethical liability. Prosecutors who rely on her false statements risk violating professional conduct rules, damaging their credibility with the court, and jeopardizing their careers. Jackson’s conduct shows a selfish disregard for the consequences her lies inflict—not just on Gerlach, but on her colleagues, the legal system, and the integrity of prosecutorial decision-making. Her continued inappropriate involvement, strategic timing, and coordination with law enforcement and prosecutors on a case that she is not a party to obstruct the fair administration of justice, violates Gerlach’s Constitutional Rights, and violates judicial ethics.
Filing Retaliatory Restraining Order Based on Falsehoods	Judge Charlene Jackson allegedly misused her judicial status and access to court processes to file a personal restraining order against Erin Gerlach—timed to coincide with Gerlach’s arrest for custodial interference. Jackson was not assigned to the criminal case and had no lawful role in it, yet she inserted herself by filing sworn statements designed to discredit Gerlach and influence proceedings she had no jurisdiction over. By March 2025, Jackson had already recused herself from Gerlach’s custody case, yet she remained fully aware that her own misconduct was on the verge of exposure. That misconduct includes intentional procedural violations, constant failure to follow Arizona law, habitual bias, collusion, incessant violations of litigants and children's constitutional rights, and a disturbing pattern of placing children with known abusers including individuals with documented histories of sexual violence and pedophilia. In Gerlach’s case, Jackson issued custody orders without proper jurisdiction, rendering them legally voidable. Her rulings were based on a sham UCCJEA determination, delivered without notice, without a hearing, and without the statutory findings required under Arizona law. She then allowed Gerlach’s opposing party—a sworn law enforcement officer—to commit egregious fraud on the court, including dozens of blatant acts of perjury. Jackson ignored the contradictions in his sworn statements, refused to review the evidence, and continued issuing orders that placed Gerlach and her child in danger.

Faced with the likelihood that her misconduct would be exposed through Gerlach's criminal proceedings, Judge Charlene Jackson filed a personal restraining order filled with demonstrably false and defamatory claims. Her intent was clear: to preemptively discredit Gerlach, distort the narrative, and suppress lawful oversight before the truth could reach public view. She accused Gerlach of harassment for filing complaints, requesting public records, and quoting court documents—actions explicitly protected under Arizona law and the First Amendment. These allegations were never raised during active litigation, never entered into the record, and were strategically deployed to silence a protective mother who was publicly exposing Jackson's unlawful activities.

Jackson went further by accusing Gerlach of bizarre and baseless conduct that never occurred—fabrications designed to smear her credibility and influence unrelated proceedings. Unfortunately, the restraining order itself now stands as evidence of Jackson's misconduct. Filed under penalty of perjury, it reflects a calculated abuse of judicial authority and a reckless disregard for the truth.

Despite having no jurisdiction over Gerlach's criminal case, Jackson knowingly and intentionally interfered with the proceedings by submitting false claims of harassment designed to influence a judicial officer. Her status as a sitting judge lent those statements undue credibility, and prosecutors—trusting the sworn words of a judicial officer—cited them to justify suggesting stricter bond conditions. In doing so, Jackson weaponized her title to distort facts and manipulate outcomes in a case she had no lawful role in.

The prosecutor, unaware of the retaliatory nature and lack of evidentiary support behind Jackson's claims, presented them to the court. That misplaced trust compromised the integrity of the proceedings and exposed the prosecutor to reputational harm and potential damage to her career. Relying on perjured statements from a judge—especially in a high-stakes criminal matter—places legal professionals in ethically precarious positions and risks violating professional conduct rules.

Jackson's misuse of judicial credibility was not a lapse in judgment—it was a calculated move to advance her personal vendetta. Once again, she influenced another member of the judicial system to do her dirty work for her, without regard for the lives, reputations, or constitutional rights she trampled in the process.

Publicly Disparaging Litigants During Active Cases	Judge Charlene Jackson made sworn statements in her March 2025 restraining order application that included demonstrably false and defamatory claims about Erin Gerlach—claims she never raised in court, never entered into the record, and never disclosed during the 2 years she actively presided over Gerlach’s custody case. These statements were not only fabricated, but they were also strategically timed to coincide with Gerlach’s criminal proceedings and advocacy efforts, demonstrating retaliatory intent. Jackson’s allegations were based on protected speech and lawful oversight activity, yet she repackaged them as misconduct in a sworn legal filing. Her statements were then used by prosecutors to argue for stricter bond conditions in Gerlach’s criminal case—placing Gerlach at greater risk of incarceration and directly influencing judicial perception. By submitting demonstrably false and defamatory claims in her March 2025 restraining order—months after recusing herself from the custody case—Judge Charlene Jackson continued to exert influence over Erin Gerlach’s liberty, reputation, and treatment in a separate criminal proceeding that she had no jurisdiction over and no lawful role in. Jackson was never assigned to Gerlach’s criminal case, yet her sworn statements were used by prosecutors to argue for stricter bond conditions, directly impacting Gerlach’s detention and judicial perception. These statements were not raised during active litigation, never entered into the family court record, and were based on protected oversight activity. Jackson’s misuse of her judicial credibility placed legal professionals in ethically compromised positions. Any attorney who relies on knowingly false statements risks violating professional conduct rules and undermining the integrity of their case. By injecting falsehoods into a legal process, she had no authority over, Jackson blurred the line between judge and complainant, weaponizing her status to retaliate against a whistleblower and obstruct justice. Her actions inflicted reputational harm, chilled lawful oversight, and meet the threshold for unlawful interference under A.R.S. § 13–2810.
Ex parte monitoring and communications	Judge Charlene Jackson allegedly engaged in undisclosed, behind-the-scenes monitoring of Erin Gerlach’s social media activity, public records requests, and communications with oversight bodies—including the Judicial Performance Review

	Board and the Arizona Commission on Judicial Conduct—while still presiding over Gerlach’s custody case. This surveillance was not part of any formal proceeding, nor was it disclosed to Gerlach or entered into the record. Jackson coordinated with court personnel and law enforcement to track Gerlach’s protected speech and advocacy efforts, including posts that criticized judicial misconduct and exposed procedural violations. Jackson later cited one of these posts—published in October 2024—as “ex parte communication” in her March 2025 restraining order application, despite never raising the issue during active litigation. This retroactive framing of public dissent as improper contact violates judicial ethics and weaponizes protected speech to justify personal legal action. Jackson’s failure to disclose her monitoring while continuing to rule on Gerlach’s case constitutes a serious breach of neutrality and due process. It also suggests that Jackson was gathering evidence for a personal complaint while still acting as a judicial officer—blurring the line between judge and litigant. By engaging in undisclosed communications and surveillance outside the bounds of formal proceedings, Jackson obstructed Gerlach’s access to fair process, compromised the integrity of the court, and interfered with lawful oversight. These actions meet the threshold for unlawful interference under A.R.S. § 13–2810 and raise grave concerns about abuse of power, retaliatory intent, and the chilling of constitutionally protected speech.
Coercive surveillance and intimidation	Judge Charlene Jackson allegedly weaponized court security and law enforcement resources to monitor, intimidate, and retaliate against Erin Gerlach during active litigation. According to the complaint, Jackson initiated surveillance of Gerlach’s speech, filings, and advocacy efforts—including her public records requests and communications with oversight bodies—without lawful basis, judicial findings, or notice to Gerlach. This surveillance was covert, retaliatory, and designed to suppress Gerlach’s constitutionally protected oversight activity. More disturbingly, Jackson admitted in her March 2025 restraining order that law enforcement officers she was coordinating with were physically present in the courtroom on the day of a scheduled hearing—an act clearly intended to intimidate Gerlach while she was actively litigating her case. The complaint further alleges that these same officers repeatedly traveled to California to surveil Gerlach across state lines on Arizona taxpayer's dime.

	This conduct amounts to stalking under the guise of judicial coordination and reflects a gross abuse of public resources. The intimidation escalated when Jackson filed a personal restraining order against Gerlach, then had her served seven separate times—including twice in court and once while she was incarcerated. These repeated service attempts were not procedural necessities; they were strategic acts of psychological pressure designed to reinforce a false narrative of threat, disrupt Gerlach’s ability to participate meaningfully in her defense, and manipulate her treatment in custody. Jackson’s conduct created a hostile environment that chilled Gerlach’s speech, obstructed her access to fair process, and placed her at heightened risk of punitive action. By using her judicial status to direct surveillance, coordinate with law enforcement, and manipulate courtroom dynamics, Jackson violated the appearance of neutrality and weaponized public institutions to retaliate against a litigant who lawfully exposed misconduct. These actions meet the threshold for unlawful interference under A.R.S. § 13–2810 and raise grave concerns about abuse of power, retaliatory intent, and the use of coercive tactics to silence oversight, suppress judicial accountability, and endanger a protective mother and her child.
Ignoring lawful procedures and due process	Judge Charlene Jackson repeatedly violated core procedural safeguards required under Arizona law, the Arizona Constitution, and federal due process protections. Her conduct obstructed lawful proceedings, denied litigants their statutory rights, and inflicted irreparable harm—meeting the threshold for unlawful interference under A.R.S. § 13–2810. 1. Jurisdictional Violations and Void Orders Jackson issued substantive rulings while lacking jurisdiction. She conducted a 15-minute UCCJEA conference with only a few hours’ notice via email, denying parties adequate time to respond or obtain counsel. She then issued a one-sentence order asserting jurisdiction—deliberately formatted to be non-appealable, blocking Gerlach from seeking review. 2. Denial of Due Process During Hearings Jackson refused to allow Gerlach to speak or submit evidence during critical hearings. She ignored police reports, victim rights forms, and other exhibits without review, then ruled on custody and safety issues without a complete record. After discarding the evidence,

she publicly accused Gerlach of fabricating victimhood—an act of retaliatory defamation from the bench.

3. Retaliatory, Biased, and Non-Legal Orders Jackson issued a warrant for Gerlach just days after receiving notice of an appeal and a federal lawsuit—clear retaliation. She continued ruling on the case while harboring undisclosed personal bias, failing to recuse herself despite believing she was a victim of Gerlach’s alleged harassment. Her rulings were not grounded in law or fact, but in personal animus.

4. Improper Service and Enforcement Jackson authorized enforcement actions—including contempt findings and warrants—despite knowing Gerlach had not been properly served. The opposing party admitted on the record that Gerlach had not received notice, yet Jackson proceeded anyway, depriving her of the opportunity to respond and violating the most basic tenets of due process.

5. Ignoring Victim and Child Protection Mandates Jackson refused to enforce valid protective orders and removed protections without hearings or findings. She placed a child and protective mother in dangerous situations, ignoring Arizona’s domestic violence statutes, constitutional protections, and federal mandates designed to safeguard vulnerable families.

6. Destruction, Alteration, and Concealment of Records Jackson muted or erased segments of the For The Record (FTR) courtroom audio, destroyed evidence, and failed to preserve a complete judicial record. This obstructed the integrity of the proceedings and denied Gerlach the ability to appeal or seek review—an act that directly undermines the rule of law.

7. Issuing Rulings in Non-Appealable Formats Jackson repeatedly used minute entries and procedural tricks to avoid appellate oversight. She admitted off the record to placing jurisdictional rulings into non-appealable formats, deliberately denying Gerlach meaningful review and violating Rule 2.6(A) of the Arizona Code of Judicial Conduct.

Each of these actions reflects a willful disregard for legal standards and judicial ethics. Jackson’s pattern of misconduct prioritized control over justice, retaliation over neutrality, and secrecy over transparency. Her behavior obstructed lawful proceedings, endangered children, and silenced a protective mother—constituting interference under A.R.S. § 13–2810 and exposing egregious abuse from the bench.

Violations of A.R.S. § 13–2310 – Fraudulent Schemes and Artifices

Violation	Description
Allowing and facilitating perjury and fraud upon the court	Jackson knowingly permitted false testimony and fraudulent evidence to be presented in cases she presided over, violating procedural and ethical rules.
Issuing court orders based on fabricated facts or perjured affidavits	Warrants and custody decisions were issued based on misrepresentations and false statements that Jackson endorsed or refused to correct.
Misrepresenting or fabricating jurisdictional authority	Jackson issued orders without proper jurisdiction and refused to vacate void rulings, misleading parties about her legal authority.
Falsifying court records or suppressing material evidence	She muted or deleted courtroom audio, discarded adverse evidence, and altered records to support fabricated narratives.
Utilizing fraudulent LinkedIn profile information	Jackson misrepresented her employment history and credentials, including fabricated claims about working for luxury brands, damaging public trust.
Retaliatory legal actions against whistleblowers	Jackson filed false or fraudulent restraining orders against complainants to silence opposition and obstruct justice.
Strategic filing to mislead other judicial officers	Her restraining order was timed to influence judges presiding over Gerlach’s other cases, creating a false narrative of threat or misconduct.
Placing rulings in non-appealable formats	Jackson intentionally structured rulings to evade appellate review and conceal procedural misconduct.
Use of false sworn statements to suppress oversight	Jackson used misrepresentations in her restraining order to gain legal advantage and retaliate against Gerlach’s protected oversight activity.

Misrepresentation to obtain legal orders for personal retaliation	Jackson used false pretenses to secure court orders that served her personal interests rather than legitimate judicial function.

Violations of A.R.S. § 38–504(C) – Misuse of Public Funds / Resources

Violation	Description
Weaponizing Court Security and Law Enforcement for Personal Retaliation	Judge Charlene Jackson repeatedly misused taxpayer-funded court security and law enforcement resources to retaliate against Erin Gerlach and other critics of the judiciary. These actions were not based on credible threats or criminal conduct, but on constitutionally protected speech, oversight activity, and whistleblowing. Jackson directed officers to monitor Gerlach’s online activity, public statements, and physical movements—specifically in response to Gerlach’s lawful complaints, advocacy efforts, communications with oversight agencies, and threats to go to the media about her custody case. In her restraining order, Jackson admitted involving police for personal protection, despite providing no evidence of danger. If Jackson genuinely believed she was at risk, she would have recused herself from Gerlach’s case. Her decision to remain on the case for over a year while claiming to feel threatened undermines the credibility of her claims and suggests retaliatory intent. More disturbingly, Jackson admitted—on record—that she and other judicial officers use law enforcement to identify critics who speak about them online, even when those individuals have committed no crime and are exercising First Amendment rights. She further admitted to allegedly obtaining the private home address of a person who published a legal article critical of her—an article clearly protected under free speech. These actions represent a gross misuse of public funds, law enforcement authority, and judicial influence for personal gain. By repurposing public safety infrastructure to suppress dissent, intimidate whistleblowers, and retaliate against oversight, Jackson violated multiple laws and weaponized the justice system against those seeking accountability. These acts diverted law enforcement and court resources away from legitimate

	threats and redirected them toward shielding misconduct and silencing critics.
Issuance of retaliatory warrants and orders	Jackson issued warrants and sanctions shortly after Gerlach filed appeals and judicial complaints. These actions triggered law enforcement responses that consumed public resources without valid judicial purpose. The timing and lack of evidentiary basis suggest retaliation rather than impartial adjudication.
Improper Hearings and Conferences Without Notice	Jackson held hearings with inadequate notice, denied parties the opportunity to present evidence, and failed to follow procedural requirements. These defective proceedings wasted court time, administrative labor, and public funds—while undermining the rights of litigants and the integrity of the judicial process.
Destroying, Manipulating, or Concealing Public Records	Jackson is alleged to have muted or erased segments of official courtroom recordings, destroyed key evidence, and failed to preserve a complete public record in cases involving Gerlach. These acts were carried out using taxpayer-funded equipment, software, and IT systems. Instead of promoting transparency, Jackson used public tools to obstruct accountability and conceal misconduct. This manipulation of the public record undermines the integrity of the judiciary and violates Arizona’s public records laws.
Filing retaliatory restraining order in personal capacity	Although filed in her personal capacity, Jackson used her judicial title and taxpayer-funded systems to initiate, serve, and enforce a retaliatory restraining order against Gerlach. She utilized court clerks, administrative systems, and law enforcement channels to legitimize a personal grievance. This misuse of public infrastructure for private retaliation constitutes a direct violation of A.R.S. § 38–504(C).
Leveraging judicial status to legitimize personal grievance	Jackson used her title to validate a retaliatory filing, giving the appearance of judicial legitimacy to a personal vendetta. Her restraining order was cited by prosecutors in Gerlach’s criminal case, despite being based on falsehoods and filed outside her jurisdiction. This diverted judicial attention and resources from legitimate cases and undermined public trust in the bench. Jackson also named other judicial officers in her restraining order to bolster her fraudulent claims including former presiding judge Bruce Cohen.

Coordinated intimidation of complainants using court systems	Jackson allegedly used taxpayer-funded court processes to intimidate Gerlach and other whistleblowers. This included retaliatory filings, surveillance, and punitive rulings—all designed to suppress oversight and discourage complaints. Public infrastructure was repurposed to protect Jackson’s reputation rather than uphold justice.
Surveillance of protected speech without legal basis	Jackson directed court security and law enforcement to monitor Gerlach’s constitutionally protected speech, including advocacy, public commentary, and complaint filings. These actions violated administrative codes and wasted public funds on surveillance that had no legal justification.
Abuse of courtroom authority to suppress dissent	Jackson created hostile courtroom environments, issued punitive rulings including taking their children away, and denied procedural fairness to parties who challenged her authority. These actions served personal interests and retaliatory motives, not judicial integrity. Public resources were used to enforce biased outcomes and suppress dissent.
Failure of Oversight Enabling Continued Misuse	Despite multiple complaints from many litigants and publicly documented misconduct, Jackson’s actions persisted unchecked. This failure of internal oversight allowed her to continue misusing public funds and resources, compounding financial harm and eroding public confidence in the judiciary.

Federal Law Violations

Federal Criminal and Civil Rights Implications

Judge Charlene Jackson's conduct may give rise to federal civil rights liability under **42 U.S.C. § 1983**, which provides a cause of action against state actors who violate constitutional rights under color of law. While judicial officers are generally protected by judicial immunity for actions taken within their official capacity, this immunity does not extend to non-judicial conduct or actions taken in clear absence of jurisdiction.

Additionally, the coordinated nature of the alleged misconduct spanning judicial actors, law enforcement personnel, oversight agencies, and legal counsel raise serious concerns under federal criminal statutes. The systematic use of government resources to surveil, harass, and retaliate against a whistleblower through law enforcement, court security, and oversight bodies may constitute a conspiracy to deprive citizens of their civil rights. Under **18 U.S.C. § 242**, it is a federal crime for any person acting under color of law to willfully deprive another of rights protected by the Constitution or laws of the United States. This includes retaliation for protected speech, denial of due process, and misuse of judicial authority to silence dissent.

The alleged misconduct against Erin Gerlach may also satisfy the elements of a **Racketeer Influenced and Corrupt Organizations Act (RICO)** violation. RICO applies to patterns of criminal activity conducted through an "enterprise," which may include public institutions and government officials.

A plausible RICO theory could identify the enterprise as an "association-in-fact" involving Judge Jackson, Officer Shawn Freeman, his attorney Caitlin Andrade, and other individuals allegedly colluding with court-appointed professionals and law enforcement personnel. The alleged pattern of racketeering activity—fraudulent filings, falsified affidavits, improperly obtained warrants, and retaliatory legal actions—appears directed toward suppressing complaints and punishing a protective parent.

Obstruction of Justice

The manipulation of the judicial record and the use of judicial process to impede a criminal matter implicate both federal and state laws governing obstruction of justice. The federal statute, **18 U.S.C. § 1503**, prohibits any person from corruptly influencing, impeding, or endeavoring to obstruct the due administration of justice. Similarly, Arizona law, **A.R.S. § 13-2409**, defines obstruction as using or

threatening to use violence, force, or a false or misleading instrument or information to obstruct, delay, or prevent an investigation or the prosecution of a crime.

The deliberate muting or deletion of official court recordings, which are essential for appellate review and procedural integrity, constitutes a direct act of obstructing justice under both statutes. Similarly, the alleged use of a civil restraining order to influence a separate criminal proceeding represents a concerted effort to impede the fair administration of law. This pattern of conduct reflects a deliberate strategy to subvert the judicial process, rather than a mere overreach of authority.

The act of pursuing a restraining order and participating in investigations against a litigant while simultaneously presiding over her case is a direct and corrupt attempt to silence a whistleblower and prevent the exposure of judicial misconduct. Judge Jackson's alleged efforts to keep the litigant "quiet" and avoid accountability for her own actions fall squarely within the scope of these obstruction statutes.

Administrative Misconduct and Abuse of Public Resources

Administrative Code Violations (AZ Code of Judicial Administration)

Violation	Description
Misuse of Public Resources – Administrative Misconduct	Surveillance of Gerlach for constitutionally protected speech is not a legitimate use of taxpayer-funded court security or law enforcement. This constitutes misuse of public office and violates administrative codes governing judicial conduct and resource allocation.
ACJA § 1–302 – Code of Conduct for Judicial Employees	Judicial employees, including court security personnel, must act in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Monitoring Gerlach for protected speech violates this standard and reflects improper use of judicial resources.
ACJA § 1–303 – Court Security Standards	Court security operations must be based on legitimate safety concerns—not personal retaliation or surveillance of constitutionally protected activity. Monitoring Gerlach’s online presence in response to complaints and media statements exceeds authorized security functions.
ACJA § 1–401 – Financial Administration	Public funds must be used in a fiscally responsible and legally authorized manner. Deploying taxpayer-funded personnel to surveil a litigant for exercising First Amendment rights violates financial accountability standards.
ACJA § 1–308 – Judicial Officers and Employees	Judicial officers and employees must avoid impropriety and the appearance of impropriety. Coordinated surveillance of a complainant—especially when concealed from the record—creates the appearance of institutional bias and undermines the integrity of the judiciary.

Institutional Collusion and Public Harm

The misconduct surrounding Judge Charlene Jackson has inflicted deep and lasting harm—not just on one litigant, but on the public at large. When a judge uses her position to retaliate against a mother for seeking accountability, and when oversight bodies, law enforcement, and court infrastructure allegedly join in that retaliation, the damage is systemic and far reaching. Children are placed in dangerous environments. Protective parents are silenced. And the very institutions meant to safeguard justice become tools of intimidation.

This case sends a chilling message to every citizen: if you speak out, if you file a complaint, if you try to expose misconduct—you may be illegally surveilled, criminalized, and publicly condemned by the very system you trusted to protect you. The erosion of due process, the suppression of advocacy, and the collapse of oversight mechanisms have created a climate of fear and impunity. Public confidence in Arizona’s judiciary is not just shaken—it’s shattered. And until these abuses are addressed, every family who enters the courtroom does so under the shadow of a system that no longer serves justice, but power.

Institutional Complicity and Coordinated Retaliation

1. The Arizona Commission on Judicial Conduct (ACJC)

Judge Charlene Jackson’s sworn statements reveal a deeply troubling response by the Arizona Commission on Judicial Conduct. Rather than investigating Erin Gerlach’s allegations of judicial misconduct, the Commission appears to have engaged in retaliatory surveillance. According to Jackson’s own restraining order petition, the Commission alerted court security and initiated monitoring of Gerlach’s online activity—actions that suggest a punitive response to a constitutionally protected complaint.

When Gerlach reported that Jackson had been assigned to a case involving her niece—a clear conflict of interest—the Commission did not investigate. Instead, it questioned how Gerlach had discovered the familial relationship. Gerlach subsequently submitted public records herself, after conducting independent research. The Commission’s apparent attempt to reframe this lawful inquiry as “cyberstalking” is legally indefensible and reflects a failure to fulfill its statutory mandate.

Rather than functioning as an independent check on judicial misconduct, the Commission became complicit in suppressing oversight. This conduct undermines

its credibility and erodes public trust in Arizona's judicial accountability framework. Gerlach only learned of the surveillance because Jackson disclosed it in her petition, raising serious concerns about covert monitoring of other complainants.

Such institutional behavior implicates constitutional protections against retaliation, viewpoint discrimination, and the suppression of dissent. The weaponization of oversight mechanisms to shield judges from scrutiny and intimidate complainants is incompatible with principles of transparency, fairness, and democratic governance. It reflects a systemic breakdown in the very safeguards designed to protect the public from judicial abuse.

2. Court Security and Law Enforcement Coordination

Judge Charlene Jackson's own admissions reveal a troubling pattern of coordinated surveillance and retaliatory enforcement targeting litigant Erin Gerlach for engaging in constitutionally protected activities. The involvement of court security, local law enforcement, and potentially federal fusion centers appears not to have been prompted by any credible threat, but rather by Gerlach's exercise of her First Amendment rights—specifically, her efforts to petition the government, expose judicial misconduct, and engage in lawful oversight.

Compounding this concern is the fact that the law enforcement agency pursuing Gerlach for custodial interference employs her opposing party in the custody dispute—a SWAT officer. Despite this disqualifying conflict of interest, Jackson admitted to participating in investigative efforts against Gerlach while continuing to preside over the custody case. The agency lacked jurisdiction over Gerlach's residence, Jackson's residence, and the courthouse, further underscoring the impropriety of its involvement.

The diversion of public safety resources to monitor and suppress a litigant's speech constitutes a serious breach of public trust. At a time of constrained law enforcement capacity, the use of these resources for personal retaliation rather than public protection reflects a misuse of governmental authority.

This conduct amounts to a form of judicial stalking—the weaponization of institutional power to silence dissent. It raises grave constitutional concerns under the First and Fourteenth Amendments, implicating both free speech and due process. Participating agencies, by enabling surveillance without lawful justification, jeopardized their ethical obligations and professional certifications in service of a judge's apparent personal vendetta.

Such coordination between judicial officers and enforcement agencies to suppress criticism undermines the principles of democratic governance. It demands

immediate and transparent investigation to protect individual rights and restore institutional integrity.

The actions of Judge Charlene Jackson in connection with the Gerlach matter constitute a systemic deprivation of constitutional rights. Her rulings and conduct, tainted by undisclosed bias, retaliation, and procedural irregularities, violated guarantees under both the **United States Constitution** and the **Arizona Constitution**. As a matter of law, such violations render judicial orders void and unenforceable.

a. **Denial of Due Process and Appellate Review**

Judge Jackson intentionally manipulated the appellate record by placing jurisdictional determinations in non-appealable minute entries, and by muting portions of the For the Record (FTR) audio, including statements in which she admitted this deliberate tactic. Such conduct deprived Gerlach of meaningful access to appellate review, in violation of the **Due Process Clause of the Fourteenth Amendment to the U.S. Constitution** and **Article 2, Section 11 of the Arizona Constitution**, which guarantees that justice shall be administered openly and without denial.

b. **Retaliation for Constitutionally Protected Speech and Oversight**

In her March 2025 restraining order, Judge Jackson explicitly identified Gerlach's judicial complaints, public records requests, and oversight activities as "harassment." This demonstrates that Jackson retaliated against Gerlach for engaging in activities protected by the **First Amendment to the U.S. Constitution** and **Article 2, Section 6 of the Arizona Constitution**, which secure the rights to free speech, petition, and public criticism of government officials. By weaponizing judicial authority against protected activity, Jackson chilled Gerlach's lawful exercise of constitutional rights.

c. **Conflict of Interest and Denial of an Impartial Tribunal**

While actively presiding over Gerlach's custody matter, Judge Jackson coordinated with law enforcement connected to Gerlach's opposing party, participated in surveillance efforts against her, and concealed her personal view that Gerlach's filings and complaints constituted harassment. The **Due Process Clause of the Fourteenth Amendment** and **Article 2, Section 23 of the Arizona Constitution** guarantee litigants a fair and impartial tribunal. As established in *In re Murchison*, 349 U.S. 133 (1955), and *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009),

judicial bias or the appearance thereof vitiates due process. Jackson's undisclosed conflict of interest and concealed animus therefore rendered her orders void ab initio.

d. **Violation of Substantive Due Process Rights Relating to Family Integrity and Child Safety**

Jackson's disregard for evidence of domestic violence and child abuse, and her decisions placing Gerlach's child in unsafe conditions, violated substantive due process protections afforded under the **Fourteenth Amendment** and **Article 2, Section 8 of the Arizona Constitution**, which recognizes the sanctity of family and home. Especially when Gerlach's opposing party admitted he committed domestic violence in his pleadings claiming that Gerlach allowed their child to witness significant domestic violence committed by Father against Mother. Jackson removed the child from her only caretaker and placed her with their abuser. The U.S. Supreme Court has affirmed these protections in *Troxel v. Granville*, 530 U.S. 57 (2000), recognizing a parent's fundamental right to the care, custody, and control of their child. Jackson's actions represent a clear violation of these constitutional protections.

e. **Retaliatory Warrants and Sanctions**

Judge Jackson issued warrants and sanctions against Gerlach in close temporal proximity to Gerlach's filing of judicial complaints and appeals, conduct that constitutes unlawful retaliation. Retaliatory judicial action undermines neutrality and equal application of the law, in contravention of the **Equal Protection Clause of the Fourteenth Amendment** and **Article 2, Section 13 of the Arizona Constitution**, which prohibit discriminatory treatment and guarantee equal privileges and immunities under the law.

Judge Jackson's conduct reflects a pattern of systemic constitutional violations, including denial of due process, infringement of First Amendment rights, deprivation of an impartial tribunal, interference with family integrity, and retaliatory judicial action. Orders issued under such conditions are not merely erroneous but are constitutionally infirm and **void as a matter of law**. The continuation of enforcement actions based upon these defective orders compounds the violations, undermines public confidence in the judiciary, and imposes unlawful burdens on both the litigant and the taxpayers of Arizona.

Systemic Failure by Arizona Officials

Arizona had multiple opportunities to intervene:

- **Judicial complaints** have been filed against Jackson.
- **Notice of Claim** outlining her misconduct was filed.
- **A Recall petition** highlighting her abuse of authority & failure to follow the law was filed with the Board of Elections.
- Substantial public records documenting **perjury, fraud, and collusion exist on Jackson's docket.**
- **Numerous Motions for Change of Judge or Venue or Motions for Recusal filed with Presiding Judges.**

Yet officials failed to act. This abdication allowed Jackson's misconduct to metastasize into a malicious criminal prosecution of a mother that now drains millions of taxpayer dollars on a personal vendetta while eroding public confidence in law enforcement and the judiciary.

It appears the presiding judges also violated the Arizona Code of Judicial Conduct by ignoring the multiple Motions for Change of Judge and formal complaints that put them on notice of Judge Jackson's misconduct. The Code further obligates judges to report any credible evidence of judicial wrongdoing to the appropriate authority, yet the Commission's inaction indicates those mandatory reports were never made, allowing her behavior to continue unaddressed.

Key Areas of Public Harm

Harm	Expanded Description
Endangering Children and Protective Parents	Judge Jackson repeatedly placed children in the custody of individuals accused of serious abuse—including a father indicted for molesting his own children—while penalizing protective mothers who tried to shield their children from harm. In multiple cases, she ignored police reports, medical records, and witness testimony. Protective parents were labeled as unstable, alienating, or “harassing” simply for raising safety concerns. This judicial pattern directly endangered vulnerable children and emboldened alleged abusers.
Erosion of Due Process	Jackson systematically denied basic legal protections: she muted or erased courtroom audio, refused to review submitted evidence, blocked witnesses from testifying, and issued ex parte warrants to remove children from their homes without notice. These actions stripped litigants of their right to be heard, to defend themselves, and to challenge judicial decisions. Families were torn apart in secret, without transparency or accountability—violating the very foundation of justice.
Retaliation Against Whistleblowers	Litigants who filed complaints, requested public records, or spoke out about judicial misconduct were met with restraining orders, surveillance, and public condemnation. Erin Gerlach, for example, was monitored by court security after she threatened to speak to the media. Her advocacy was reframed as “harassment,” and she was criminally charged while Jackson continued to preside over her case. This retaliation sends a clear message: transparency will be punished.
Criminalization of Advocacy	Constitutionally protected speech—such as filing complaints, contacting oversight bodies, and speaking to journalists—was reframed as criminal behavior. Gerlach was charged with felony custodial interference after exposing misconduct, despite acting within her legal rights. Jackson’s restraining order cited lawful oversight actions as evidence of danger. This criminalization of advocacy creates a chilling effect, deterring others from speaking out or seeking help.
Collapse of Oversight Mechanisms	

	The Arizona Commission on Judicial Conduct allegedly failed to investigate Jackson’s misconduct and instead alerted court security to monitor Gerlach. Rather than acting as a check on judicial abuse, the Commission became an enabler—triggering surveillance and reinforcing retaliation. Complaints were dismissed, ignored, or deflected. This collapse of oversight allowed misconduct to escalate unchecked and signaled to the public that accountability is not available through official channels.
Loss of Public Trust in the Judiciary	Jackson’s ability to act with impunity—backed by law enforcement, court staff, and oversight bodies—has triggered widespread outrage. Families, advocates, and legal professionals have submitted petitions, published reports, and called for legislative intervention. The public no longer sees the court as a place of fairness, but as a fortress protecting its own. This erosion of trust undermines the legitimacy of the judiciary and threatens the rule of law itself.

Request for Investigation and Relief

To date, we have sent formal letters to Chief Justice Ann A. Scott Timmer; the Arizona Auditor General; the Arizona Attorney General; members of the Joint Legislative Audit Committee; the Legislature's House and Senate Judiciary Committees; the U.S. Department of Justice Civil Rights Division; the U.S. Commission on Civil Rights' Arizona Advisory Committee; the Presiding Judge of the Maricopa County Superior Court; other key officials; other government agencies; and private watchdog groups, urging a comprehensive review of the Arizona Commission on Judicial Conduct's operations and finances.

Our proposal consists of three core initiatives:

1. **Independent Performance and Financial Audits** – Conduct a performance audit of the Commission's complaint-intake and investigative procedures, compliance with the Code of Judicial Conduct, and any conflicts of interest among staff. – Conduct a financial audit of all taxpayer-funded expenditures, with particular focus on any use of resources for surveillance, coordination with judges, or retaliation against individuals exercising their constitutional rights.
2. **Criminal and Civil-Rights Investigation** – Authorize the Attorney General and appropriate law-enforcement agencies to investigate potential violations of Arizona criminal statutes (e.g., stalking, computer tampering, official misconduct) and federal civil-rights laws related to unauthorized surveillance, harassment, and retaliation. – Examine evidence of collusion among Judge Jackson, Commission personnel, court security, presiding judges, and law-enforcement entities—including any coordination with the Judicial Performance Review Board or Mesa Police Department during the period Judge Jackson presided over Gerlach's custody case.
3. **Safeguards and Transparency Measures** – Require public disclosure of all audit and investigation findings. – Assess whether other litigants or complainants have been subjected to similar unconstitutional retaliation or surveillance. – Implement immediate procedural safeguards to prevent further abuses and ensure that all Arizonans' Constitutional Rights fully protected.

Conclusion

The Arizona Commission on Judicial Conduct repeatedly ignored credible reports of Judge Jackson's judicial misconduct, retaliatory actions and failed to enforce the mandatory recusal and ethical obligations set forth in the Arizona Code of Judicial Conduct. After the Commissions repeated failure to act, Gerlach sent misconduct findings to the Arizona Supreme Court—which finally compelled Judge Jackson's recusal from the domestic-relations proceeding in November of 2024. Yet, in a striking example of institutional breakdown, Judge Jackson then 4-months later, invoked that very complaint as “harassment” in her restraining-order petition, underscoring both her ongoing abuse of judicial power and the Commission's complicity through inaction.

This systemic abdication by the Commission, coupled with Judge Jackson's sustained misconduct, has seriously eroded public trust in Arizona's courts, violated litigants' constitutional protections, amounts to criminal wrongdoing and is exposing Arizona to Civil Liability. We therefore call for an immediate, comprehensive investigation; rigorous performance and financial audits; and prompt legislative and administrative reforms to restore accountability, safeguard taxpayer resources, and protect every Arizonan's Constitutional Rights.

Retaliation Warning & Request for Protective Oversight

There is a credible and urgent concern that Erin Gerlach will be subjected to further retaliation by Judge Charlene Jackson as a direct consequence of this complaint submission. Judge Jackson has previously weaponized the legal system to punish Gerlach for engaging in protected oversight activity, including filing judicial complaints, submitting public records requests, and exposing misconduct through lawful advocacy. The restraining order Jackson filed against Gerlach was not based on any credible threat or unlawful conduct—it was a retaliatory measure targeting constitutionally protected speech.

Any future legal action initiated by Judge Jackson against Gerlach must be treated as unlawful retaliation and documented accordingly. This includes—but is not limited to—any involvement in Gerlach’s criminal case, procedural interference in her family court matters, renewed harassment from the same law enforcement agency Jackson has repeatedly relied upon and conspired with, or any attempt to use court infrastructure or personal connections within the legal, judicial, or law enforcement systems to silence, surveil, or punish her. These tactics reflect a pattern of judicial abuse and coordinated targeting that demands immediate protective oversight.

Moreover, any retaliatory action taken against Gerlach following this submission must be recognized not only as unlawful, but as a furtherance of the conspiracy Judge Jackson is actively engaged in. Her continued abuse of taxpayer resources for a personal vendetta, use of court authority, and institutional relationships to suppress dissent and evade accountability is not isolated misconduct, it is part of a broader, coordinated effort to obstruct justice and retaliate against a whistleblower. The Arizona Commission on Judicial Conduct is urged to treat this complaint as a protected act under **Rule 2.16(C)** and the First Amendment, and to ensure that Gerlach is shielded from further harm.

I affirm that the facts and allegations above are to the best of my knowledge true, based on documents, records, and sworn statements. I understand that under Rule 2.16 of the Arizona Code of Judicial Conduct, retaliation by a judge for filing a complaint is prohibited. I therefore request protection for myself and Gerlach from any retaliation.

Thank you for your attention to this crucial matter. The integrity of Arizona’s judiciary, and the rights of litigants—especially vulnerable children depend on fair, impartial, and ethical judicial conduct.

In order to ensure this complaint receives proper attention, and is not ignored through deliberate indifference, we are making a copy of this complaint publicly available.

CC: Chief Justice Ann A. Scott Timmer
Arizona Auditor General
Arizona Attorney General
Members of the Joint Legislative Audit Committee (JLAC)
Arizona State Legislators – Judiciary Committee
U.S. Department of Justice, Civil Rights Division
U.S. Commission on Civil Rights – Arizona Advisory Committee
Presiding Judge, Maricopa County Superior Court
Arizona Governor